

Mojave Desert Air Quality Management District

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Visit our web site: http://www.mdaqmd.ca.gov Brad Poiriez, Executive Director

February 8, 2018

Carol Sutkus
State of California
Environmental Protection Agency
Air Resources Board
P. O. Box 2815
Sacramento, California 95812

Project Title: Amendment of MDAQMD Rule 1114 - Wood Products Coating Operations

Dear Ms. Sutkus:

The Mojave Desert Air Quality Management District (MDAQMD) requests that the California Air Resources Board submit amended Rule 1114 – *Wood Products Coating Operations*, to the United States Environmental Protection Agency (USEPA) for inclusion in the State Implementation Plan (SIP).

The amendments to Rule 1114 – *Organic Solvent Degreasing Operations* are necessary to satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Technology Guidelines (CTG) and for major sources of ozone precursors.

The District requests CARB submit to USEPA the proposed amendments to Rule 1114 to replace the SIP versions in effect in the San Bernardino County portion of the MDAB and the Blythe/Palo Verde Valley portion of Riverside County. While not specifically mentioned in the Direct Final Rule for the 11/25/96 version of Rule 1114 (63 FR 44132, 08/18/98), the District assumes that the approval action was for both the San Bernardino County portion of the MDAB and the Blythe/Palo Verde Valley portion of Riverside County, and that SCAQMD Rule 1136 – Wood Furniture and Cabinet Coatings was thereby removed from the SIP for the Blythe/Palo Verde Valley portion of Riverside County. (please refer to Section (F) of the Staff Report for a complete SIP History and Analysis discussion).

If you have any questions regarding this submittal, please contact me at (760) 245-1661, extension 6726, or Tracy Walters at extension 6122. Please note that all documents required for a complete submission were sent electronically on February 8, 2018.

Sincerely,

Alan J. De Salvio

Deputy Director – Mojave Desert Operations

AJD/tw

CARB SIP Submittal Request MD Rule 1114 020818

SIP COMPLETENESS CHECKLIST

(Electronic Format)

*** TO BE COMPLETED BY DISTRICT AND RETURNED TO ARB ***

All rules submitted to the EPA as State Implementation Plan (SIP) revisions must be supported by certain information and documentation for the rule packages to be deemed complete for review by the EPA. Rules will not be evaluated for approvability by the EPA unless the submittal packages are complete. To assist you in determining that all necessary materials are included in rules packages sent to the ARB for submittal to the EPA, please fill out the following form and include it with the rule package you send ARB. See the ARB's <u>Guidelines on the Implementation of the 40 CFR 51, Appendix V</u>, for a more detailed explanation than is provided here. Adopted rules and rule amendments should be checked against U.S. EPA's <u>Guidance Document for Correcting Common VOC & Other Rule Deficiencies</u> (Little Blue Book, August 21, 2001) to ensure that they contain no elements which will result in disapproval by EPA.

District: Mojave Desert Air Quality Management District

Rule No: <u>1114</u>

Rule Title: Wood Products Coating Operations

Date Adopted or Amended: January 22, 2018

ADMINISTRATIVE MATERIALS

Note: All documents should be in electronic format. Items that have signatures, initials, or stamps may be scanned.

<u>Attached</u>	Not <u>Attached</u>	<u>N/A</u>	
			<u>COMPLETE COPY OF THE RULE:</u> Provide an unmarked copy of the entire rule as adopted or amended by your District Board.
			UNDERLINE AND STRIKEOUT COPY OF THE RULE: If an amended rule, provide a complete copy of the rule indicating in underline and strikeout format all language which has been added, deleted, or changed since the rule was last adopted or amended. (See Staff Report Appendix A)
			COMPLETE COPY OF THE REFERENCED RULE(S): For any rule which includes language specifically referencing another rule, a copy of that other rule must also be submitted, unless it has already been submitted to EPA as part of a previous SIP submittal.
			PUBLIC NOTICE EVIDENCE: Include a copy of the local newspaper clipping certification(s), stating the date of publication, which must be at least 30 days before the hearing. As an alternative, include a copy of the actual published notice of the public hearing as it appeared in the local newspaper(s). In this case, however, enough of the newspaper page must be included to show the date of publication. The notice must specifically identify by title and number each rule adopted or amended. (See Staff Report Appendix B)
			RESOLUTION/MINUTE ORDER: Provide the Board Clerk certified resolution or minute order. This document must include certification that the hearing was held in accordance with the information in the public notice. It must also list the rules that were adopted or amended, the date of the public hearing, and a statement of compliance with California Health and Safety Code Sections 40725-40728 (Administrative Procedures Act).
			PUBLIC COMMENTS AND RESPONSES: Submit copies of written public comments made during the notice period and at the public hearing. Also submit any written responses prepared by the District staff or presented to the District Board at the public hearing. A summary of the public comments and responses is adequate. If there were no comments made during the notice period or at the hearing, please indicate N/A to the left. (See Staff Report Appendix C)

SIP COMPLETENESS CHECKLIST (Electronic Format)

*** TO BE COMPLETED BY DISTRICT AND RETURNED TO ARB ***

	RULE EVALUATION FORM: See instructions for completing the Rule Evaluation Form and the accompanying sample form.
	NON-EPA TEST METHODS: Attach all test methods that are referenced in your rule that do not appear in 40 CFR 51, 60, 61, 63, or have not been previously submitted to EPA. EPA methods used in other media such as SW846 for solid waste are not automatically approved for air pollution applications. Submittal of test methods that are not EPA-approved should include the information and follow the procedure described in Region 9's "Test Method Review & Evaluation Process."
	MODELING SUPPORT: Provide if appropriate. In general, modeling support is not required for VOC and NOx rules to determine their impacts on ozone levels. Modeling is required where a rule is a relaxation that affects large sources (≥ 100 TPY) in an attainment area for SO2, directly emitted PM10, CO, or NOx (for NO2 purposes). In cases where EPA is concerned with the impact on air quality of rule revisions which relax limits or cause a shift in emission patterns in a nonattainment area, a reference back to the approved SIP will be sufficient provided the approved SIP accounts for the relaxation and provided the approved SIP used the current EPA modeling guidelines. If current EPA modeling guidelines were not used, then new modeling may be required.
	ECONOMIC AND TECHNICAL JUSTIFICATION FOR DEVIATIONS FROM EPA POLICIES: The District staff report or other information included with the submittal should discuss all potential relaxations or deviations from RACT, RACM, BACT, BACM, enforceability, attainment, RFP, or other relevant EPA requirements. This includes, for example, demonstrating that exemptions or emission limits less stringent than the presumptive RACT (e.g., a CTG) meet EPA's 5 percent policy, and demonstrating that all source categories exempted from a RACM/BACM rule are de minimus according to EPA's RACM/BACM policy. (See Staff Report)
	<u>ADDITIONAL MATERIALS</u> : Provide District staff reports and any other supporting information concerning development of the rule or rule changes. This information should explain the basis for all limits and thresholds contained in the rule.

APCD/AQMD RULE EVALUATION FORM - Page 1 (Electronic Format)

GENERAL INFORMATION

District: Mojave Desert Air Quality Management District
Rule No(s): 1114 Date adopted/Amended/Rescinded: Amended 01/22/2018
Rule Title(s): Wood Products Coating Operations
Date Submitted to ARB: 02/08/2018
If an Amended Rule, Date Last Amended (or Adopted): 11/25/1996
Is the Rule Intended to be Sent to the U.S. EPA as a SIP Revision? 🖂 Yes 🗌 No (If No, do not complete remainder of form)
District Contact: <u>Tracy Walters</u> Phone Number: <u>(760) 245-1661 x6122</u> E-mail Address: <u>twalters@mdaqmd.ca.gov</u>
Narrative Summary of New Rule or Rule Changes: ☐ New Rule ☐ Amended Rule
The amendments to Rule 1114 are necessary to satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors. The District does not currently have sources meeting the threshold in the CTG, but does have an existing RACT rule. Additionally, the District is amending this rule to satisfy a prior commitment to implement the provisions of H&S Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and cost-effective control measures for Particulate Matter from a list of potential local control measures promulgated by CARB. The amendments update rule definitions; VOC content; transfer efficiency requirements; VOC content for strippers and surface preparation materials; work practices; control device efficiency; and test methods. Pollutant(s) Regulated by the Rule (Check): ROG (NOx) SO2 (CO) PM TAC (name):
II. <u>EFFECT ON EMISSIONS</u>
Complete this section ONLY for rules that, when implemented, will result in quantifiable changes in emissions. Attach reference(s) for emission factor(s) and other information. Attach calculation sheet showing how the emission information provided below was determined.
Net Effect on Emissions: ☐ Increase ☐ Decrease ☐ N/A
Emission Reduction Commitment in SIP for this Source Category: N/A
Inventory Year Used to Calculate Changes in Emissions: N/A Area Affected: N/A
Future Year Control Profile Estimate (Provide information on as many years as possible): N/A

APCD/AQMD RULE EVALUATION FORM - Page 2 (Electronic Format)

Baseline inventory in the SIP for the Control Measure: <u>N/A</u>
Emissions Reduction Commitment in the SIP for the Control Measure: N/A
Revised Baseline Inventory (if any): N/A
Revised Emission Reduction Estimate (if developed): N/A
Note that the district's input to the Rule Evaluation Form will not be used as input to the ARB's emission forecasting and planning.
III. SOURCES/ATTAINMENT STATUS
District is: ☐ Attainment ☐ Nonattainment ☐ Split
Approximate Total Number of Small (<100 TPY) Sources Affected by this Amendment: 5
Percent in Nonattainment Area: 100%
Number of Large (≥ 100 TPY) Sources Controlled: 0 Percent in Nonattainment Area: 0%
Name(s) and Location(s) (city and county) of Large (\geq 100 TPY) Sources Controlled by Rule (Attach additional sheets as necessary): N/A
IV. <u>EMISSION REDUCTION TECHNOLOGY</u>
Does the Rule Include Emission Limits that are Continuous? ☐ Yes ☐ No
If Yes, Those Limits are in Section(s) N/A of the Rule.
Other Methods in the Rule for Achieving Emission Reductions are: <u>VOC limits, control device efficiency, work practices</u> surface preparation and cleanup solvent limits.
V. <u>OTHER REQUIREMENTS</u>
The Rule Contains:
Emission Limits in Section(s): \underline{C} Work Practice Standards in Section(s): \underline{C} Recordkeeping Requirements in Section(s): \underline{F} Reporting Requirements in Section(s): \underline{F}

APCD/AQMD RULE EVALUATION FORM - Page 3 (Electronic Format)

No Impact ■ No Impact ■ No Impact No Impact ■ No Impact ■ No Impact ■ No Impact No Impact ■ No Impact No Impact	☐ Impacts RFP	☐ Impacts attainment
Discussion: There ar	e no potential adverse	environmental impacts of compliance with the adoption of Rule 1114. Rule
1114 will impose addi	itional controls on VOCs	s, control device efficiency, work practices, surface preparation and cleanup
solvent VOC limits		

VI.

IMPACT ON AIR QUALITY PLAN

1	A RESOLUTION OF THE GOVERNING BOARD OF THE MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT MAKING FINDINGS,
2 3	CERTIFYING THE NOTICE OF EXEMPTION AMENDING RULE 1114 – WOOD PRODUCTS COATING OPERATIONS AND DIRECTING STAFF ACTIONS.
4	On January 22, 2018, on motion by Member BARBARA RIORDAN , seconded by
5	Member CARMEN HERNANDEZ, and carried, the following resolution is adopted:
6	WHEREAS, the Mojave Desert Air Quality Management District (MDAQMD or
7	District) has authority pursuant to California Health and Safety Code (H&S Code) §§40702,
8	40725-40728 to adopt, amend or repeal rules and regulations; and
9	WHEREAS, the Federal Clean Air Act (FCAA) requires areas designated non-
10	attainment and classified moderate and above to implement Reasonably Available Control
11	Technology (RACT) for sources subject to Control Techniques Guidelines (CTG) documents
12	issued by United States Environmental Protection Agency (USEPA) and for "major sources"
13	of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NOx) which are ozone
14	precursors; and
15	WHEREAS, the MDAQMD adopted the 2015 8-Hour Reasonably Available Control
16	Technology - State Implementation Plan Analysis (RACT SIP Analysis) in February, 2015
17	which committed to amending Rule 1114 - Wood Products Coating Operations to current
18	Federal RACT; and
19	WHEREAS, the MDAQMD has a wood products coating operations rule which was
20	amended November 25, 1996 and approved as RACT into the SIP in 1998 (63 FR 44132,
21	08/18/1998); and
22	WHEREAS, this rule is subject to the CTG titled Control of Volatile Organic
23	Compound Emissions from Wood Furniture Manufacturing Operations (EPA-453/R-96-007,
24	April 1996) and the CTG titled Control Techniques Guidelines: Industrial Cleaning Solvents
25	(EPA 453/R-06-001, September 2006); and
26	WHEREAS, this source category is also subject to two additional CTGs titled
27	Control of Volatile Organic Emissions from Existing Stationary Sources - Volume VII:
2	Factory Surface Coating of Flat Wood Paneling (EPA 450/2-78-032 June 1978) and Control

1	Techniques Guidelines for Flat Wood Paneling Coatings (EPA 453/R-06-004, September
2	2006), but since there are no flat wood paneling operations within the Districts jurisdiction
3	Federal Negative Declarations were adopted for the two flat wood paneling coating CTGs on
4	February 23, 2015 as part of the 2015 RACT SIP analysis adoption; and
5	WHEREAS, the District has several facilities that primarily coat wood products and
6	some additional facilities that may coat wood products as part of their operations; and
7	WHEREAS, there are no current facilities that meet the specific applicability
8	threshold of the CTG titled Control of Volatile Organic Compound Emissions from Wood
9	Furniture Manufacturing Operations (sources located in nonattainment areas that emit, or
10	have the potential to emit, 25 tons/year or more of VOCs); and
11	WHEREAS, the MDAQMD is proposing to update Rule 1114 – Wood Products
12	Coating Operations to reflect current federal RACT because it has an existing RACT rule;
13	and
14	WHEREAS, additionally, the provisions of former H&S Code §39614(d) required
15	the adoption of certain control measures for Particulate Matter (PM) from a list promulgated
16	by the California Air Resources Board (CARB) contained in the Proposed List of Measures
17	to Reduce Particulate Matter - PM10 and PM2.5 (Implementation of Senate Bill 656, Sher
18	2003); and
19	WHEREAS, former H&S Code §39614(d) (expired by its own terms on January 1,
20	2011) required the adoption of the most readily available, feasible and cost-effective local
21	control measures for PM as contained on a list developed by CARB; and
22	WHEREAS, this list required the adoption of Reasonably Available Control
23	Measures (RACM) for PM; and
24	WHEREAS, the proposed amendments to Rule 1114 satisfy both of these
25	requirements; and
26	WHEREAS, the proposed amendments to the Rule are necessary as indicated herein
27	and in the supporting documentation; and
28	WHEREAS, the MDAQMD has the authority pursuant to H&S Code §40702 to

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amend rules and regulations; and

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WHEREAS, the proposed amendments to Rule 1114 are clear in that the meaning can be easily understood by the persons impacted by the Rule; and

WHEREAS, the amendments to Rule 1114 are in harmony with, and not in conflict with, or contradictory to existing statutes, court decisions, or state or federal regulations because the proposed rule is consistent with the CTG provisions and other District rules deemed to meet RACT; and

WHEREAS, when analyzed, the provisions of Rule 1114 were determined to be readily available, feasible and cost-effective for Wood Products Coatings PM control measures promulgated by CARB; and

WHEREAS, the District had committed to further evaluate the Wood Flat Stock Coatings control measure but Rule 1114 is not applicable to wood flat stock, and the District previously filed a FND for this type of operation, making this evaluation unnecessary; and

WHEREAS, the proposed amendments do not impose the same requirements as any existing state or federal regulation because CTGs and the CARB Proposed List of Measures to Reduce Particulate Matter - PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003) (former H&S Code §39614(d)) are primarily guidance documents and not enforceable in and of themselves and a rule is necessary to implement the applicable provisions of these documents; and

WHEREAS, the proposed amendments to Rule 1114 are needed in order to satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors, and to satisfy a prior commitment to implement the provisions of H&S Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and cost-effective control measures for Particulate Matter from a list of potential local control measures promulgated by CARB; and

WHEREAS, a public hearing has been properly noticed and conducted, pursuant to H&S Code §40725, concerning the amendments to Rule 1114; and

1	WHEREAS, a Notice of Exemption, a Categorical Exemption (Class 8, 14 CCR
2	§15308) for the proposed amendments to Rule 1114, completed in compliance with the
3	California Environmental Quality Act (CEQA), has been presented to the Governing Board
4	of the MDAQMD; each member having reviewed, considered and approved the information
5	contained therein prior to acting on the proposed amendments to Rule 1114 and the
6	Governing Board of the MDAQMD having determined that the proposed amendments will
7	not have any potential for resulting in any adverse impact upon the environment; and
8	WHEREAS, the Governing Board of the MDAQMD has considered the evidence
9	presented at the public hearing; and
10	NOW, THEREFORE, BE IT RESOLVED, that the Governing Board of the
11	MDAQMD finds that the amendments to Rule 1114 - Wood Products Coating Operations
12	are necessary, authorized, clear, consistent, non-duplicative and properly referenced; and
13	BE IT FURTHER RESOLVED, that the Governing Board of the MDAQMD
14	hereby makes a finding that the Class 8 Categorical Exemption (14 CCR §15308) applies and
15	certifies the Notice of Exemption for the proposed amendments to Rule 1114; and
16	BE IT FURTHER RESOLVED, that the Governing Board of the MDAQMD does
17	hereby adopt, pursuant to the authority granted by law, the proposed amendments to Rule
18	1114, as set forth in the attachments to this resolution and incorporated herein by this
19	reference; and
20	BE IT FURTHER RESOLVED, that this resolution shall take effect immediately
21	upon adoption, and that the Executive Office Manager is directed to file the Notice of
22	Exemption in compliance with the provisions of CEQA.
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2	PASSED, APP	PROV	ED and ADO	PTED by the Governing Board of the Mojave Desert Air
3	Quality Manage	ement	District by the	e following vote:
4	AYES:	11	MEMBER:	CAMARGO, COLE, COX, DECONINCK,
5				HERNANDEZ, LEONE, LOVINGOOD, PEREZ,
6				RAMOS, RIORDAN, SWANSON
7	NOES:		MEMBER:	
8	ABSENT:	2	MEMBER:	STANTON, WILLIAMS
9	ABSTAIN:		MEMBER:	
10				\
11	STATE OF CA	A IEO	D NII A	
12	STATE OF CA	LH O.	KNIA) SS:
13	COUNTY OF	SAN F	RERNARDIN	
14		DIXIVE	ER TRIBITY)
15	I Dean	na Her	nandez Senic	or Executive Analyst of the Governing Board of the
16	Mojave Desert	Air Q	uality Manage	ment District, hereby certify the foregoing to be a full, of the action as the same appears in the Official Minutes
17				ring of January 22, 2018.
18 19	Dus			
20	Senior Executive Mojave Desert		• '	ment District
20	Wiojave Descri	All Qi	uanty ivianage	ment District
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MINUTES OF THE GOVERNING BOARD OF THE MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT VICTORVILLE, CALIFORNIA

AGENDA ITEM #20

DATE: January 22, 2018

RECOMMENDATION: Conduct a public hearing to consider the amendment of Rule 1114 – *Wood Products Coating Operations*: a. Open public hearing; b. Receive staff report; c. Receive public testimony; d. Close public hearing; e. Make a determination that the California Environmental Quality Act (CEQA) Categorical Exemption applies; f. Waive reading of Resolution; g. Adopt Resolution making appropriate findings, certifying the Notice of Exemption, amending Rule 1114 and directing staff actions.

SUMMARY: Rule 1114 is proposed for amendment to satisfy 42 U.S.C. §§7511a (Federal Clean Air Act (FCAA) §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) and for major sources of ozone precursors. Additionally, the District is amending this rule to satisfy a prior commitment to implement the provisions of Health & Safety (H&S) Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and cost-effective control measures for Particulate Matter from a list of potential local control measures promulgated by the California Air Resources Board (CARB).

CONFLICT OF INTEREST: None

BACKGROUND: The FCAA requires areas designated non-attainment and classified moderate and above to implement RACT for sources subject to CTG documents issued by United States Environmental Protection Agency (USEPA) and for "major sources" of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors. The Mojave Desert Air Quality Management District (MDAQMD or District) adopted the 2015 8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis) in February, 2015 which committed to amending Rule 1114 – Wood Products Coating Operations to current Federal RACT. The MDAQMD has a wood products coating operations rule which was amended November 25, 1996 and approved as RACT into the SIP in 1998 (63 FR 44132, 08/18/1998). This rule is subject to the CTG titled Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations (EPA-453/R-96-007, April 1996) and the CTG titled Control Techniques Guidelines: Industrial Cleaning Solvents (EPA 453/R-06-001, September 2006). This source category is also subject to

CUSTODIAN OF RECORDS OF MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT, HEREBY CERTIFY THE FOREGOING TO BE A FULL, TRUE AND CORRECT COPY OF THE RECORD OF THE ACTION AS THE SAME APPEARS IN THE OFFICIAL MINUTES OF SAID GOVERNING BOARD MEETING

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT.

MINUTES OF THE GOVERNING BOARD OF THE MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT VICTORVILLE, CALIFORNIA

AGENDA ITEM #20

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two additional CTGs titled Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VII: Factory Surface Coating of Flat Wood Paneling (EPA 450/2-78-032, June 1978) and Control Techniques Guidelines for Flat Wood Paneling Coatings (EPA 453/R-06-004, September 2006). Since there are no flat wood paneling operations within the Districts jurisdiction Federal Negative Declarations were adopted for the two flat wood paneling coating CTGs on February 23, 2015 as part of the 2015 RACT SIP analysis adoption.

The District has several facilities that primarily coat wood products and some additional facilities that may coat wood products as part of their operations. There are no current facilities that meet the specific applicability threshold of the CTG titled Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations (sources located in nonattainment areas that emit, or have the potential to emit, 25 tons/year or more of VOCs). The MDAQMD is proposing to update Rule 1114 – Wood Products Coating Operations to reflect current federal RACT because it has an existing RACT rule.

Additionally, the provisions of former Health & Safety Code (H&S Code) §39614(d) required the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by CARB contained in the Proposed List of Measures to Reduce Particulate Matter – PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003). Former H&S Code §39614(d) (expired by its own terms on January 1, 2011) required the adoption of the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by CARB. Furthermore, this list required the adoption of Reasonably Available Control Measures (RACM) for PM. The proposed amendments to Rule 1114 satisfy both of these requirements.

A <u>Notice of Exemption</u>, Categorical Exemption (Class8; 14 Cal. Code Reg. §15308) will be prepared by the MDAQMD for the amendment of Rule 1114 pursuant to the requirements of CEQA.

REASON FOR RECOMMENDATION: Health & Safety Code §§40702 and 40703 require the Governing Board to hold a public hearing before adopting rules and regulation. Also, 42 U.S.C. §7410(l) (FCAA §110(l)) requires that all SIP revisions be adopted after public notice and hearing.

REVIEW BY OTHERS: This item was reviewed by Karen Nowak, District Counsel as to legal form and by Alan De Salvio, Deputy Director – Mojave Desert Operations on or about January 8, 2018.

FINANCIAL DATA: No increase in appropriation is anticipated.

PRESENTER: Alan De Savio, Deputy Director – Mojave Desert Operations

MINUTES OF THE GOVERNING BOARD OF THE MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT VICTORVILLE, CALIFORNIA

AGENDA ITEM #20

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ACTION OF THE GOVERNING BOARD

ADOPTED

Upon Motion by **BARBARA RIORDAN**, Seconded by **CARMEN HERNANDEZ**, as approved by the following roll call vote:

approvou o.	, 1110 101	io migration can vote.
Ayes:	11	CAMARGO, COLE, COX, DECONINCK, HERNANDEZ, LEONE LOVINGOOD, PEREZ, RAMOS, RIORDAN, SWANSON
Noes:		
Absent: Abstain:	2	STANTON, WILLIAMS
Vacant:		
DEANNA	HERNA	ANDEZ, SENIOR EXECUTIVE ANALYST
BY _	ــــود	
Dated: JAI	NUARY	7 22, 2018

Ref. Resolution 18-04, "A RESOLUTION OF THE GOVERNING BOARD OF THE MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT MAKING FINDINGS, CERTIFYING THE NOTICE OF EXEMPTION, AMENDING RULE 1114 – WOOD PRODUCTS COATING OPERATIONS AND DIRECTING STAFF ACTIONS."

(Adopted: 03/02/92; Amended: 02/22/95; Amended: 11/25/96;

Amended: 01/22/18)

Rule 1114 Wood Products Coating Operations

(A) General

- (1) Purpose
 - (a) The purpose of this Rule is to limit the emission of Volatile Organic Compounds from Wood Products Coating Application Operations.
- (2) Applicability
 - (a) This Rule applies to Wood Products Coating Application Operations within the Mojave Desert Air Quality Management District.

(B) Definitions

The definitions contained in District Rule 102 – *Definition of Terms* shall apply unless the term is otherwise defined herein:

- (1) "<u>Binders</u>" Non-volatile polymeric Organic Materials (resins) which form the surface film in Coating applications.
- (2) "<u>Clear Sealer</u>" A Coating containing Binders, but not opaque pigments, which seals the Wood Products prior to application of the subsequent Coatings.
- (3) "Coating Application Operations" A combination of Coating application steps which may include use of spray guns, flash-off areas, spray booths, ovens, conveyors, and/or other Equipment operated for the purpose of applying Coating materials and associated surface preparation and cleanup.
- (4) "<u>Composite Wood</u>" A manufactured material consisting of tightly compressed wood fibers bonded with resins which includes, but is not limited to, particleboard, fiberboard and hardboard.
- (5) "<u>Conversion Varnish</u>" A topcoat or sealer which is comprised of an alkyd or other resin, blended with amino resin, in a homogeneous liquid that, when acid catalyzed and applied, hardens by evaporation and polymerization.
- (6) "Crackle Lacquer" A clear or Pigmented Topcoat intended to produce a cracked or crazed appearance when dry.

1114-1

- (7) "<u>Custom Replica Furniture</u>" New, made-to-order furniture that looks like antique furniture, rather than new furniture. It features detailed wood carvings and bruising of the wood to simulate antique furniture.
- (8) "Faux Finishes" A finish intended to simulate a surface other than wood, including sand, slate, marble, metal, metal flake, or leather.
- (9) "<u>Filler</u>" A material which is applied to a Wood Product, and whose primary function is to build up, or fill the voids and imperfections in the Wood Product to be coated.
- (10) "<u>High-Solids Stains</u>" Stains containing more than one (1) pound of solids per gallon by weight.
- (11) "Imitation Wood Grain" A hand applied finish that simulates the appearance of a specific natural wood grain.
- (12) "<u>Leaf Finishes</u>" A finish used in conjunction with metal leaf or foil.
- (13) "Low-Solids Stains, Toners and Washcoats" Stains, Toners and Washcoats containing one (1) pound of solids per gallon, or less, by weight.
- (14) "<u>Low-Volume, Low-Pressure" (LVLP)</u> Spray Coating application Equipment with air pressure between 0.1 and 10.0 psig and air volume less than 15.5 cfm per spray gun and which operates at a maximum fluid delivery pressure of 50 psig.
- (15) "<u>Medium Density Fiberboard (MDF) Coatings</u>" The initial Coating which is applied directly to the surface of MDF. MDF is a wood product composed of tightly compressed wood fibers bonded with resins, and has a density greater than 45 pounds per cubic foot.
- (16) "<u>Mold-Seal Coating</u>" The initial Coating applied to a new mold or repaired mold to provide a smooth surface which, when coated with a mold release Coating, prevents products from sticking to the mold.
- (17) "New Wood Product" A Wood Product which has not been previously coated. A Wood Product from which Coatings have been removed to repair flaws in initial Coating applications is a New Wood Product.
- (18) "Panel" A flat piece of wood or Wood Products, usually rectangular, and used inside homes and mobile homes for wall decorations.
- (19) "<u>Pigmented Primers, Sealers and Undercoats</u>" Opaque Coatings which contain Binders and colored pigments which are formulated to hide the wood surface, that are applied prior to the topcoat to provide a firm bond, level the wood product surface, or seal the wood product surface.

- (20) "<u>Pigmented Topcoat</u>" A final opaque Coating which contains Binders and colored pigments, and is specifically formulated to hide the wood surface and form a solid protective film.
- (21) "Rate Per Day" The amount applied between 12:00 a.m. and 11:59 p.m. on the same calendar day.
- (22) "Refinished Wood Product" A post-consumer Wood Product which has had some or all of the Coatings removed, and to which new Coatings are applied in order to preserve or restore the post-consumer wood product to its original condition. A wood product from which Coatings have been removed to repair flaws in initial Coating applications is not a Refinished Wood Product.
- (23) "Shutter" An exterior screen or cover for a window, usually hinged and often fitted with louvers. This includes non-functional Shutters.
- (24) "<u>Simulated Wood Materials</u>" Materials, such as plastic, glass, metal, that are made to give a wood-like appearance or are processed like Wood Products.
- (25) "<u>Stencil Coating</u>" An Ink or a pigmented Coating which is rolled or brushed onto a template or stamp in order to add identifying letters and/or numbers to Wood Products.
- (26) "<u>Tint</u>" A colorant added in small quantities to a Stain to achieve a particular color for the finished product.
- (27) "Toner" A Wash Coat which contains Binders and dyes or pigments to add Tint to a coated surface.
- (28) "VOC Content" The weight of VOC per volume of Coating. VOC Content is VOC Regulatory, as defined in subsection (G)(4)(a)(i), for all Coatings except those in the Low Solids category. For Coating in the Low Solids category, the VOC Content is VOC Actual, as defined in subsection (G)(4)(a)(ii). If the Coating is a multi-component product, the VOC Content is VOC Content as mixed or catalyzed. If the Coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.
- (29) "Wash Coat" A Coating that contains no more than 1.0 pounds of solids per gallon, by weight, which is used to seal wood surfaces, prevent undesired staining, and control penetration.
- (30) "Wood Products" Those surface coated room furnishings which include cabinets (kitchen, bath, and vanity), tables, chairs, beds, sofas, Shutters, art objects, and any other coated object made of solid wood and/or Composite Wood and/or made of Simulated Wood Material used in combination with solid wood or Composite Wood.

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(C) Requirements

- (1) Limits for VOC Content of Coatings & Adhesives for New Wood Products
 - (a) Except as provided in subsections (C)(4) or (C)(5), no Person shall apply any Coatings to a New Wood Product if such materials have a VOC Content exceeding the applicable limits specified in Table 1. The VOC Content of Coatings, except Low-Solids Stains, Toners, Washcoats and Solvents shall be determined in accordance with subsection (G)(4)(a)(i) and (G)(2)(a). The VOC Content of Low-Solids Stains, Toners, Washcoats and Solvents shall be determined in accordance with subsection (G)(4)(a)(ii) and (G)(2)(a). VOC limits expressed in grams VOC per liter of Coating shall be used.

Table 1 VOC Content of Coatings and Adhesives for New Wood Products

Coating	Current Limit	On and After 01/31/2019
	g/l (lb/gal) Less Water and Less Exempt Compounds	g/L (lb/gal) Less Water and Less Exempt Compounds
General	N/A	275 (2.3)
Clear Sealers	275 (2.3)	275 (2.3)
Clear Topcoats	275 (2.3)	275 (2.3)
Pigmented Primers, Sealers and Undercoats	275 (2.3)	275 (2.3)
Pigmented Topcoats	275 (2.30	275 (2.3)
Fillers	275 (2.3)	275 (2.3)
High-Solids Stains	350 (2.9)	350 (2.9)
Inks	500 (4.2)	500 (4.2)
Mold Seal	750 (6.3)	750 (6.3)
Multi-Colored Coatings	275 (2.3)	275 (2.3)
Low-Solids Stains, Toners and Washcoats	120 (1.0)	120 (1.0)
Adhesives	250 (2.1)	250 (2.1)
Conversion Varnish	N/A	550 (4.6)

- (2) Limits for VOC Content of Coatings & Adhesives for Refinishing, Repairing, Preserving or Restoring Wood Products
 - (a) Except as provided in subsections (C)(4) or (C)(5), no Person shall apply any Coatings to refinish, repair, preserve or restore a wood product if such materials have a VOC Content exceeding the applicable limits specified in Table 2. The VOC Content of Coatings, except Low-Solids Stains,

Toners, Washcoats and Solvents shall be determined in accordance with subsection (G)(4)(a)(i) and (G)(2)(a). The VOC Content of Low-Solids Stains, Toners, Washcoats and Solvents shall be determined in accordance with subsection (G)(4)(a)(ii) and (G)(2)(a). VOC limits expressed in grams VOC per liter of Coating shall be used.

Table 2
VOC Content of Coatings and Adhesives for Refinishing,
Repairing, Preserving or Restoring Wood Products

Coating	g/l (lb/gal) Less Water and Less Exempt Compounds
General	420 (3.5)
Clear Topcoats	680 (5.7)
Conversion Varnishes	550 (4.6)
Fillers	500 (4.2)
High-Solids Stains	700 (5.8)
Inks	500 (4.2)
Medium Density Fiberboard (MDF) Coatings	680 (5.7)
Mold-Seal Coating	750 (6.3)
Multi-Colored Coatings	680 (5.7)
Pigmented Coatings	600 (5.0)
Sealers	680 (5.7)
Low-Solids Stains, Toners and Washcoats	480 (4.0)
Any other Low Solids Coatings	480 (4.0)

(3) Transfer Efficiency

- (a) A Person or Facility shall not apply Coatings to Wood Products subject to the provisions of this Rule unless the Coating is applied with properly operating Equipment, according to manufacturer's suggested guidelines, and by the use of one of the following methods:
 - (i) Flow Coat;
 - (ii) Dip Coat;
 - (iii) High-Volume Low-Pressure (HVLP) spray;
 - (iv) Low-Volume Low-Pressure spray Equipment;
 - (v) Paint brush;
 - (vi) Hand roller;
 - (vii) Roll Coater;
 - (viii) Air-Assisted Airless Spray (for Touch-Up and Repair Coating only);
 - (ix) Electrostatic Application Equipment; or

- (x) Such other Coating application methods as are demonstrated to the Air Pollution Control Officer to have a Transfer Efficiency equal to or better than achieved by HVLP spraying and for which written approval of the Air Pollution Control Officer has been obtained.
- (4) Strippers, Surface Preparation, Clean-up Solvent and Equipment Cleaning
 - (a) The requirements of this Section shall apply to any Person using Solvent for surface preparation and cleanup.
 - (i) A Person shall not use an organic compound for surface preparation or cleanup, except Strippers, with a VOC Content in excess of 25 Grams of VOC Per Liter of Material (0.21 pounds per gallon).
 - (ii) A Person shall use closed, non-leaking, and non-absorbent containers for the storage or disposal of cloth or paper used for Solvent surface preparation and cleanup.
 - (iii) A Person shall store fresh or spent Solvent in closed containers.
 - (iv) A Person shall not use organic compounds for the cleanup of spray Equipment, including paint lines, unless Equipment for collecting the cleaning compounds and minimizing their evaporation to the Atmosphere is used.
 - (v) Spray gun nozzles only, may be soaked in Solvent-based materials for cleaning, provided the container is not more than five (5) gallons in size, and is kept tightly covered at all times except when accessing the container.
 - (vi) A Person shall not use Solvent based VOC-containing materials for the clean-up of spray Equipment used in Wood Products Coating Application Operations, unless the spray Equipment is disassembled and cleaned in an enclosed gun cleaner.
 - (b) A Person shall not use a Stripper on wood products unless:
 - (i) The Stripper contains less than 200 Grams of VOC Per Liter of Material; or
 - (ii) The VOC composite partial vapor pressure for the Stripper is 2 mm Hg (0.04 psia) or less at 68 °F (20 °C), as calculated pursuant to subsection (G)(5).
- (5) Add-On Control System
 - (a) In lieu of complying with the VOC Content limitations in subsection (C)(1), (C)(2), and/or (C)(4) above, air pollution Control Equipment with a capture and control system combined efficiency of at least 90 percent, as determined pursuant to subsections (G)(2)(b) and (G)(2)(c) of this Rule, may be used.

- (b) A Person using Control Equipment pursuant to (C)(5)(a) shall submit to the APCO for approval an Operation and Maintenance Plan for the proposed emission control device and emission collection system and receive approval prior to operation of the Control Equipment. Such Plan shall:
 - (i) Identify all key system operating parameters. Key system operating parameters are those necessary to ensure compliance with subsection (C)(5)(a), such as temperature, pressure, and/or flow rate; and
 - (ii) Include proposed inspection schedules, anticipated ongoing maintenance, and proposed recordkeeping practices regarding key operating system parameters.

(6) Prohibition of Specifications

(a) Any Person shall not specify the use in the District of any Coating to be applied to any Wood Products subject to the provisions of this Rule that does not meet the limits and requirements of this Rule. The requirements of this paragraph shall apply to all written or oral contracts.

(7) Compliance Statement Requirement

(a) The manufacturer of Coatings subject to this Rule shall include a statement of VOC Content as supplied on data sheets; including Coating components, expressed in grams per liter or pounds per gallon, excluding water and exempt Solvents.

(D) Exemptions

- (1) The provisions of subsections (C)(1)(a), (C)(2)(a), (C)(3)(a) and (C)(4) of this Rule shall not apply to:
 - (a) The use of Aerosol Coating Products.
 - (b) Facilities whose Rate Per Day of Coating use is less than one (1) gallon including any VOC-containing materials added to the original Coating as supplied by the manufacturer (only Coatings subject to this Rule shall be included in this calculation), and whose Wood Coating Application Operations do not emit more than 3 pounds of VOCs per day and not more than 200 pounds of VOCs per calendar year.
 - (c) Laminating of fiberglass, metal, or plastic sheets to wood Panels.
 - (d) The application of Coatings to musical instruments.
 - (e) The application of Coatings to billiard tables.

- (2) The provisions of subsection (C)(1)(a), and (C)(2)(a) shall not apply to Touch-Up and Repair Coatings or Stencil Coatings.
- (3) Any Facility classified as exempt or claiming to be exempt under this Section (D), shall meet the record keeping requirements of this Rule so as to be able to certify the exemption status.
- (4) Residential non-commercial operations are exempt from the provisions of this Rule.
- (5) Facilities which use of less than 55 gallons per year of Wood Products Coatings and/or Strippers (singly or in any combination) are exempt from the provisions of this Rule with the exception of Section (F).
- (6) Coatings used to provide the following finishes are exempt from the provision of subsection (C)(1)(a) and (C)(2)(a), provided that the records are maintained as specified in Section (F):
 - (a) Crackle Lacquers;
 - (b) Faux Finishes;
 - (c) Imitation Wood Grain;
 - (d) Leaf Finishes.
- (7) Tints applied to Stains in quantities not to exceed one (1) pint of Tint in any operating day are exempt from all the provisions of this Rule, provided that the records are maintained as specified in Section (F).

(E) Administrative Requirements

- (1) Rule 442 Applicability
 - (a) Any Coating, Coating Operation, or Facility which is exempt from all or a portion of the VOC Content limits of this Rule shall comply with the provisions of Rule 442 regulating those exempted activities unless compliance with the limits specified in this Rule are achieved.

(F) Monitoring and Records

- (1) Coating Records
 - (a) Any Person subject to this Rule shall comply with the following requirements:

- (i) The Person shall maintain and have available during an inspection, a current list of Coatings in use which provides all of the Coating data necessary to evaluate compliance, including the following information, as applicable:
 - a. Coating, catalyst, and reducer used.
 - b. Mix ratio of components used.
 - c. VOC Content of Coating as applied.
 - d. A data sheet, material list, or invoice giving material name, manufacturer, identification, material application and VOC Content.
- (ii) The Person shall maintain records on a daily basis including:
 - Coating and mix ratio of components used in the Coating;
 and
 - b. Quantity of each Coating applied.
- (iii) The Person shall maintain records on a daily basis showing the type and amount of Solvent and Stripper used for cleanup, surface preparation, and paint removal.
- (b) Notwithstanding the provisions of subsection (F)(1)(a), a Person or Facility which exclusively uses Coating formulations compliant with subsection (C)(1)(a) and (C)(2)(a) may maintain usage records on a monthly basis.
- (c) Persons using Stains and/or Tints and subject to this Rule shall maintain records on a monthly basis that provide the following information:
 - (i) Name, description, container size and actual VOC Content of any Tints used to color Stains.
 - (ii) Records of any Tint use shall be maintained on a daily basis.
- (2) Compliance Assurance Monitoring
 - (a) Each Coating Application Operation subject to subparagraph (C)(1)(a) or (C)(2)(a) which is using air pollution abatement Equipment to meet the control requirement shall:
 - (i) Utilize Compliance Assurance Monitoring, as approved by the APCO. Each monitoring device(s), mechanism and/or technique shall be calibrated/maintained in a manner approved by the APCO; and
 - (ii) Maintain and produce daily records of key system operating parameters and maintenance procedures which will demonstrate continuous operation and compliance of the air pollution abatement Equipment during periods of emission-producing activities. Key system operating parameters are those necessary to ensure compliance with subsection (C)(5), such as temperatures, pressures and flow rates.

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- (b) Compliance with subsection (C)(5) shall be determined by compliance testing as prescribed in subsections (G)(2)(b) and (c) and by evaluating Compliance Assurance Monitoring data.
- (3) All records for the previous five (5) year period maintained and produced pursuant to this Section shall be retained and available for inspection by the APCO upon request.

(G) Test Methods

- (1) A violation of the limits contained in this Rule, as determined by any one of these test methods, shall constitute a violation of this Rule.
- (2) The following specified test methods shall be used to determine compliance with the provisions of this Rule.
 - (a) Determination of VOC Content and solids content: Samples of Coatings and Solvent as specified in Section (C) shall be analyzed as prescribed by EPA Reference Method 24 – Determination of Volatile Matter Content. Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings for VOC Content and solids content (without correction for Exempt Compounds) and ASTM D4457-02(2008) - Standard Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph, or ARB Method 432 – Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings (09/12/1989) for determination of emissions of Exempt Compounds. Perfluorocarbon compounds shall be assumed to be absent from a product or process unless a manufacturer or Facility Operator identifies the specific individual compounds (from the broad classes of perfluorocarbon compounds) and the amounts present in the product or process and provides a test method acceptable to EPA and ARB which can be used to quantify the specific compounds.
 - (b) Determination of Emissions: For any Owners and/or Operators who choose to comply with the provisions of Section (C)(1)(a) or (C)(2)(a) through the use of air pollution abatement Equipment, emission of VOCs shall be measured as prescribed by EPA Reference Method 25 Gaseous Nonmethane Organic Emissions and EPA Reference Method 25A Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer for determination of VOC emissions (without correction for Exempt Compounds) and EPA Method 18 Volatile Organic Compounds by Gas Chromatography, or ARB Method 422 Determination of Volatile Organic Compounds in Emissions from Stationary Sources (Exempt VOCs) (12/13/1991) for measuring emission of Exempt Compounds.

- (c) Determination of Overall Control Efficiency: The Overall Control Efficiency of air pollution abatement Equipment shall be determined by a minimum of three sampling runs conducted according to USEPA's technical guidance document "Guidelines for Determining Capture Efficiency", January 9, 1995, and 40 CFR 51, Appendix M, Methods 204-204F, as applicable.
- (3) Demonstration of Transfer Efficiency of alternative application methods subject to subsection (C)(3)(a) shall be conducted in accordance with South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User" (May 24, 1989), and South Coast Air Quality Management District "Guidelines for Demonstrating Equivalency With District Approved Transfer Efficiency Spray Gun" September 26, 2002.
- (4) Calculation of VOC Content:
 - (a) For the purpose of determining compliance with the VOC Content limits in Section (C), the VOC Content of a Coating shall be determined by using the procedures in subsection (i) or (ii) below, as appropriate. If the manufacturer does not recommend thinning, the VOC Content must be calculated for the product as supplied. The VOC Content of a Tint Base shall be determined without Colorant that is added after the Tint Base is manufactured. Effective (1 year after date of adoption), if the Coating is a multi-component product, the VOC Content must be calculated as mixed or catalyzed. Effective (1 year after date of adoption), if the Coating contains Silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC Content must include the VOCs emitted during curing.
 - (i) Regulatory VOC Content The weight of VOC per combined volume of VOC and Coating solids, shall be calculated by the following equation:

$$VOC_{Regulatory} = \frac{W_v - W_w - W_{ec}}{V_m - V_w - V_{ec}}$$

Where:

VOC_{Regulatory} = Weight of VOC per liter of Coating, less water

and less Exempt Compounds

W_v = Weight of all volatile compounds, in grams

W_w = Weight of water, in grams

W_{ec} = Weight of Exempt Compounds, in grams

V_m = Volume of Coating material, in liters

V_w = Volume of water, in liters

V_{ec} = Volume of Exempt Compounds, in liters

(ii) Actual VOC Content – The weight (in grams) of VOC per liter of Wood Products Coating material is expressed as grams VOC per liter of material, and shall be calculated by the following equation:

$$VOC_{Actual} = \frac{W_v - W_w - W_{ec}}{V_m}$$

VOC_{Actual} = Weight of VOC per liter of Coating

W_v = Weight of all volatile compounds, in grams

W_w = Weight of water, in grams

W_{ec} = Weight of Exempt Compounds, in grams

V_m = Volume of Coating material, including any added VOC-containing Solvents or reducers

but excluding any colorant added to Tint the

base in liters

(5) VOC Composite Partial Vapor Pressure:

$$PP_{C} = \frac{\sum_{i=1}^{n}(W_{i})(VP_{i})/(MW_{i})}{\frac{W_{w}}{MW_{w}} + \frac{W_{e}}{MW_{e}} + \sum_{i=1}^{n}\frac{W_{i}}{MW_{i}}}$$

Where:

PP_c = VOC composite partial pressure at 68 °F (20 °C), in mm Hg

 W_i = Weight of the "I"_{th} VOC compound, in grams

 W_w = Weight of water, in grams

W_e = Weight of Exempt Compounds, in grams

MW_i = Molecular weight of the "I"_{th} VOC compound, in (g/g-mole)

MW_w = Molecular weight of water, in (g/g-mole)

MW_e = Molecular weight of Exempt Compound, in (g/g-mole)

 VP_i = Vapor pressure of the "I" th VOC compound at 68 °F (20 °C), in mm Hg

(6) Overall Control Efficiency (C.E.) shall be calculated using the following equations:

Capture Efficiency (%) =
$$\left(\frac{W_c}{W_o}\right) \times 100$$

Where:

Wc = Weight of VOC entering control device

We = Weight of VOC emitted from the source

Control Device Efficiency (%) =
$$\frac{(W_c - W_a)}{W_c} \times 100$$

Where:

W_c = Weight of VOC entering control device

W_a = Weight of VOC discharged from the control device

$$C.E.(\%) = \frac{(Capture\ Efficiency) \times (Control\ Device\ Efficiency)}{100}$$

See SIP Table at http://www.mdaqmd.ca.gov/

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Mojave Desert Air Quality Management District

Staff Report Amendments to Rule 1114 – Wood Products Coating Operations

Amended on January 22, 2018

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List of Acronyms

BACT Best Available Control Technology

BARCT Best Available Retrofit Control Technology

CARB California Air Resources Board

CCAA California Clean Air Act

CEQA California Environmental Quality Act

CTG Control Techniques Guidelines

FCAA Federal Clean Air Act

H&S Code California Health & Safety Code

MDAB Mojave Desert Air Basin

MDAQMD Mojave Desert Air Quality Management District

NOx Oxides of Nitrogen

RACM Reasonably Available Control Measures
RACT Reasonably Available Control Technology
SCAQMD South Coast Air Quality Management District

SIP State Implementation Plan

SOx Oxides of Sulfur

TAC Technical Advisory Committee

USEPA U.S. Environmental Protection Agency

VOC Volatile Organic Compounds

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STAFF REPORT Rule 1114 – Wood Products Coating Operations

I. PURPOSE OF STAFF REPORT

A staff report serves several discrete purposes. Its primary purpose is to provide a summary and background material to the members of the Governing Board. This allows the members of the Governing Board to be fully informed before making any required decision. It also provides the documentation necessary for the Governing Board to make any findings, which are required by law to be made prior to the approval or adoption of a document. In addition, a staff report ensures that the correct procedures and proper documentation for approval or adoption of a document have been performed. Finally, the staff report provides evidence for defense against legal challenges regarding the propriety of the approval or adoption of the document.

II. EXECUTIVE SUMMARY

The Federal Clean Air Act (FCAA) requires areas designated non-attainment and classified moderate and above to implement Reasonably Available Control Technology (RACT) for sources subject to Control Techniques Guidelines (CTG) documents issued by United States Environmental Protection Agency (USEPA) and for "major sources" of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors. The Mojave Desert Air Quality Management District (MDAQMD or District) adopted the 2015 8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis) in February, 2015 which committed to amending Rule 1114 – Wood Products Coating Operations to current Federal RACT. The MDAQMD has a wood products coating operations rule which was amended November 25, 1996 and approved as RACT into the SIP in 1998 (63 FR 44132, 08/18/1998). This rule is subject to the CTG titled Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations (EPA-453/R-96-007, April 1996) and the CTG titled Control Techniques Guidelines: Industrial Cleaning Solvents (EPA 453/R-06-001, September 2006). This source category is also subject to two additional CTGs titled Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VII: Factory Surface Coating of Flat Wood Paneling (EPA 450/2-78-032, June 1978) and Control Techniques Guidelines for Flat Wood Paneling Coatings (EPA 453/R-06-004, September 2006). Since there are no flat wood paneling operations within the Districts jurisdiction Federal Negative Declarations were adopted for the two flat wood paneling coating CTGs on February 23, 2015 as part of the 2015 RACT SIP analysis adoption.

The District has several facilities that primarily coat wood products and some additional facilities that may coat wood products as part of their operations. There are no current facilities that meet the specific applicability threshold of the CTG titled *Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations* (sources located in nonattainment areas that emit, or have the potential to emit, 25 tons/year or more of VOCs). The MDAQMD is proposing to update Rule 1114 – *Wood Products Coating Operations* to reflect current federal RACT because it has an existing RACT rule.

Additionally, the provisions of former Health & Safety Code (H&S Code) §39614(d) required the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by the California Air Resources Board (CARB) contained in the *Proposed List of Measures to Reduce Particulate Matter – PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003)*. Former H&S Code §39614(d) (expired by its own terms on January 1, 2011) required the adoption of the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by CARB. Furthermore, this list required the adoption of Reasonably Available Control Measures (RACM) for PM. The proposed amendments to Rule 1114 satisfy both of these requirements.

III. STAFF RECOMMENDATION

Staff recommends that the Governing Board of the Mojave Desert Air Quality Management District amend proposed Rule 1114 – *Wood Products Coating Operations* and approve the appropriate California Environmental Quality Act (CEQA) documentation. This action is necessary to satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors. This amendment also satisfies a prior commitment to implement the provisions of H&S Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and cost-effective control measures for Particulate Matter from a list of potential local control measures promulgated by CARB.

The Governing Board of the Mojave Desert Air Quality Management District amended Rule 1114 – *Wood Products Coating Operations* at the January 22, 2018 Governing Board Meeting.

IV. LEGAL REQUIREMENTS CHECKLIST

The findings and analysis as indicated below are required for the procedurally correct amendments to Rule 1114 – *Wood Products Coating Operations*. Each item is discussed, if applicable, in Section V. Copies of related documents are included in the appropriate appendices.

FINDINGS REQUIRED FOR RULES & REGULATIONS:

- X Necessity
- X Authority
- X Clarity
- X Consistency
- X Nonduplication
- X Reference
- X Public Notice & Comment
- X Public Hearing

REQUIREMENTS FOR STATE IMPLEMENTATION PLAN SUBMISSION (SIP):

- X Public Notice & Comment
- X Availability of Document
- X Notice to Specified Entities (State, Air Districts, USEPA, Other States)
- X Public Hearing
- \underline{X} Legal Authority to adopt and implement the document.
- X Applicable State laws and regulations were followed.

ELEMENTS OF A FEDERAL SUBMISSION:

 $\underline{N/A}$ Elements as set forth in applicable Federal law or regulations.

CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIREMENTS (CEQA):

- N/A Ministerial Action
- N/A Exemption
- X Negative Declaration
- N/A Environmental Impact Report
- X Appropriate findings, if necessary.
- X Public Notice & Comment

SUPPLEMENTAL ENVIRONMENTAL ANALYSIS (RULES & REGULATIONS ONLY):

- X Environmental impacts of compliance.
- <u>N/A</u> Mitigation of impacts.
- N/A Alternative methods of compliance.

OTHER:

- <u>X</u> Written analysis of existing air pollution control requirements
- N/A Economic Analysis
- X Public Review

V. DISCUSSION OF LEGAL REQUIREMENTS

A. REQUIRED ELEMENTS/FINDINGS

This section discusses the State of California statutory requirements that apply to the proposed amendments to Rule 1114. These are actions that need to be performed and/or information that must be provided in order to amend the rule in a procedurally correct manner.

1. State Findings Required for Adoption of Rules & Regulations:

Before adopting, amending, or repealing a rule or regulation, the District Governing Board is required to make findings of necessity, authority, clarity, consistency, non-duplication, and reference based upon relevant information presented at the hearing. The information below is provided to assist the Board in making these findings.

a. Necessity:

The amendments to Rule 1114 are necessary to satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors. The District does not currently have sources meeting the threshold in the CTG, but does have an existing RACT rule. Additionally, the District is amending this rule to satisfy a prior commitment to implement the provisions of H&S Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and cost-effective control measures for Particulate Matter from a list of potential local control measures promulgated by CARB.

b. Authority:

The District has the authority pursuant to California Health and Safety Code (H & S Code) §40702 to adopt, amend or repeal rules and regulations.

c. Clarity:

The amendments to Rule 1114 are clear in that they are written so that the persons subject to the Rule can easily understand the meaning.

d. Consistency:

The amendments to Rule 1114 are in harmony with, and not in conflict with or contradictory to any state law or regulation, federal

law or regulation, or court decisions. The rule is consistent with the CTG provisions and other District rules deemed to meet RACT. When analyzed, the provisions of Rule 1114 were determined to be readily available, feasible and cost-effective for Wood Products Coatings PM control measures promulgated by CARB. The District had committed to further evaluate the Wood Flat Stock Coatings control measure. Rule 1114 is not applicable to wood flat stock, and the District previously filed a FND for this type of operation, making this evaluation unnecessary.

e. Nonduplication:

The amendments to Rule 1114 do not impose the same requirements as any existing state or federal law or regulation, or court decision. CTGs and the CARB *Proposed List of Measures to Reduce Particulate Matter – PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003)* (former H&S Code §39614(d)) are primarily guidance documents and not enforceable in and of themselves. A rule is necessary to implement the applicable provisions of these documents.

f. Reference:

The District has the authority pursuant to H&S Code §40702 to adopt, amend or repeal rules and regulations.

g. Public Notice & Comment, Public Hearing:

Notice for the public hearing for the proposed amendments to Rule 1114 was published December 22, 2017. See Appendix "B" for a copy of the public notice. See Appendix "C" for copies of comments, if any, and District responses.

2. Federal Elements (SIP Submittals, Other Federal Submittals).

Submittals to USEPA are required to include various elements depending upon the type of document submitted and the underlying Federal law that requires the submittal. The information below indicates which elements are required for the proposed amendments to of Rule 1114 and how they were satisfied.

a. Satisfaction of Underlying Federal Requirements:

The FCAA requires areas designated non-attainment and classified moderate and above to implement RACT for sources subject to CTG documents issued by USEPA and for "major sources" of VOCs and NO_X that are ozone precursors. Because the District has an existing SIP rule for this CTG category, the District committed to adopting an updated RACT rule for wood products

coating operations. While the District does not have sources meeting the threshold in the CTGs it does an existing approved RACT rule. The proposed amendments are based on the CTGs and various district rules deemed as fulfilling RACT requirements, including but not limited to: San Diego County Air Pollution Control District Rule 67.11 – *Wood Products Coating Operations*; and, Placer County Air Pollution Control District Rule 236 – *Wood Products and Coating Operations*.

b. Public Notice and Comment:

Notice for the public hearing for the proposed amendments to Rule 1114 was published December 22, 2017. See Appendix "B" for a copy of the public notice. See Appendix "C" for copies of comments, if any, and District responses.

c. Availability of Document:

Copies of proposed amended Rule 1114 and the accompanying draft staff report were made available to the public on December 4, 2017. The proposed amendments were reviewed by the Technical Advisory Committee, a committee consisting of a variety of regulated industry and local governmental entities, on January 9, 2018. It was the consensus of the TAC to recommend submittal of Rule 1114 to the Governing Board for adoption.

d. Notice to Specified Entities:

Copies of proposed amended Rule 1114 and the accompanying draft staff report were sent to all affected agencies. The proposed amendments were sent to CARB and USEPA on December 4, 2017.

e. Public Hearing:

A public hearing to consider the amendments to Rule 1114 was held on January 22, 2018.

f. Legal Authority to Adopt and Implement:

The District has the authority pursuant to H&S Code §40702 to adopt, amend, or repeal rules and regulations and to do such acts as may be necessary or proper to execute the duties imposed upon the District.

g. Applicable State Laws and Regulations Were Followed:

Public notice and hearing procedures pursuant to H&S Code §\$40725-40728 have been followed. See Section (V)(A)(1) above for compliance with state findings required pursuant to H&S Code §40727. See Section (V)(B) below for compliance with the required analysis of existing requirements pursuant to H&S Code §40727.2. See Section (V)(C) for compliance with economic analysis requirements pursuant to H&S Code §40920.6. See Section (V)(D) below for compliance with provisions of the CEQA.

B. WRITTEN ANALYSIS OF EXISTING REQUIREMENTS

H&S Code §40727.2 requires air districts to prepare a written analysis of all existing federal air pollution control requirements that apply to the same equipment or source type as the rule proposed for modification by the district.

The FCAA requires areas designated non-attainment for ozone and classified moderate and above to adopt and maintain RACT rules to control the emissions of VOCs and NO_X for categories which the USEPA has adopted a CTG and for all categories where there are major stationary sources of air pollution (42 U.S.C. §7511a(b)(2), FCAA 182(b)(2)). For purposes of the FCAA, portions of the District have been designated non-attainment for ozone and classified severe-17.

The MDAQMD has a wood products coating operations rule which was amended November 25, 1996 and approved as RACT into the SIP in 1998 (63 FR 644132, 08/18/1998). This rule is subject to the CTG titled Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations (EPA-453/R-96-007, April 1996) and the CTG titled Control Techniques Guidelines: Industrial Cleaning Solvents (EPA 453/R-06-001, September 2006). This source category is also subject to two additional CTGs titled Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VII: Factory Surface Coating of Flat Wood Paneling (EPA 450/2-78-032, June 1978) and Control Techniques Guidelines for Flat Wood Paneling Coatings (EPA 453/R-06-004, September 2006). Since there are no flat wood paneling operations within the Districts jurisdiction Federal Negative Declarations were adopted for the two flat wood paneling coating CTGs on February 23, 2015 as part of the 2015 RACT SIP analysis adoption. The proposed amendments are based on the CTGs, and various district rules deemed as fulfilling RACT requirements, including but not limited to: San Diego County Air Pollution Control District Rule 67.11 – Wood Products Coating Operations; and, Placer County Air Pollution Control District Rule 236 – Wood Products and Coating Operations.

The District has several facilities that primarily coat wood products, and additional facilities that may coat wood products as part of their operations. There are no facilities that meet the specific applicability threshold of the CTG titled *Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations* but the

District has an existing RACT rule and the potential to have sources subject to the CTG applicability. Therefore, the District has chosen to update Rule 1114 to meet current federal RACT.

Former H&S Code §39614(d) required the MDAQMD to adopt the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by CARB. CARB identified on its list of local control measures two items related to wood products coating operations as potentially feasible. The District has evaluated the availability, feasibility and cost-effectiveness of applying those coating control measures related to metal parts and products coatings within the MDAQMD. The Proposed List of Measures to Reduce Particulate Matter – PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003) approved by CARB November 18, 2004, Appendix C (SB 656 List of Air District Measures that Reduce Particulate Matter) identified two strategies for wood coating operations: Strategy 81 – Wood Flat Stock Coatings, directed the District to evaluate Rule 1114 against SCAOMD Rule 1104 as amended 08/13/99; and, Strategy 82 – Wood Products Coatings directed the District to evaluate Rule 1114 against SCAOMD Rule 1136 as amended 06/14/96. Strategy 81 was evaluated and it was determined that Rule 1114 is not applicable to wood flat stock and the District has no sources of this type making this evaluation and adoption of the recommended provisions unnecessary. The District has filed a FND for this type of operation. Strategy 82 was evaluated and it was determined that the control measures listed in the CARB document were implemented at the time of the analysis. Evaluation of these strategies meets the obligation to former H&S Code§39614(d).

C. ECONOMIC ANALYSIS

1. General

RACT is defined as the lowest emissions limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility (44 FR 53762, September 17, 1979). Rule 1114 is equivalent to rules that were determined by USEPA to fulfill RACT. This determination by USEPA means that the provisions of Rule 1114 are, by definition, cost effective.

2. Incremental Cost Effectiveness

Pursuant to H&S Code §40920.6, incremental cost effectiveness calculations are required for rules and regulations which are adopted or amended to meet the California Clean Air Act (CCAA) requirements for Best Available Retrofit Control Technology (BARCT) or "all feasible measures" to control volatile compounds (VOCs), oxides of nitrogen (NOx) or oxides of sulfur (SOx). The amendment of Rule 1114 is not subject to incremental cost effectiveness calculations because it does not involve BARCT or "all feasible measures".

¹ San Diego County Air Pollution Control District Rule 67.11 – *Wood Products Coating Operations* (78 FR 21538, 04/11/2013); and, Placer County Air Pollution Control District Rule 236 – *Wood Products and Coating Operations* (76 FR 71886, 11/21/2011).

D. ENVIRONMENTAL ANALYSIS (CEQA)

Through the process described below the appropriate CEQA process for the proposed amendments to Rule 1114 was determined.

- 1. The proposed amendments to Rule 1114 meet the CEQA definition of "project". They are not "ministerial" actions.
- 2. The proposed amendments to Rule 1114 are exempt from CEQA review because the amendments will not create any adverse impacts on the environment. The proposed rule amendments are more stringent than the previous rule version. Because there is no potential that the amendments might cause the release of additional air contaminants or create any adverse environmental impacts, a Class 8 categorical exemption (14 Cal. Code Reg. §15308) applies. Copies of the documents relating to CEQA can be found in Appendix "D".

E. SUPPLEMENTAL ENVIRONMENTAL ANALYSIS

1. Potential Environmental Impacts

There are no potential adverse environmental impacts of compliance with the adoption of Rule 1114. Rule 1114 will impose additional controls on VOCs, control device efficiency, work practices, surface preparation and cleanup solvent VOC limits.

2. Mitigation of Impacts

N/A

3. Alternative Methods of Compliance

N/A

F. PUBLIC REVIEW

See Staff Report Section (V)(A)(1)(g) and (2)(b), as well as Appendix "B"

VI. TECHNICAL DISCUSSION

A. SOURCE DESCRIPTION

Rule 1114 is applicable to wood products coating application operations, defined as room furnishings including cabinets (kitchen, bath and vanity), tables, chairs, beds, sofas, shutters, art objects, and any other coated object made of solid wood and/or composite wood and/or made of simulated wood material used in combination with solid wood or composite wood.

B. EMISSIONS

The amendments update rule definitions; VOC content; transfer efficiency requirements; VOC content for strippers and surface preparation materials; work practices; control device efficiency; and test methods.

C. CONTROL REQUIREMENTS

Please see section (C) of the rule (Appendix A) for control requirements.

The amendments to Rule 1114 – *Wood Products Coating Operations* do not cause the release of additional air contaminants or create any environmental impacts.

Section (C)(1) and (C)(2) have been modified to include separate limits for "New" and "Refinishing, Repairing, Preserving or Restoring" coating limits. This approach was approved in two district rules that were recently determined by USEPA to fulfill RACT. "Refinishing, Repairing, Preserving or Restoring Wood Products" coating operations were previously exempted, so all limits, although higher that the "New" coatings limits, capture previously unregulated coating categories. The limit for Low-Solids Stains, Toners and Washcoats in Table 2 was lowered from 700 g/L as originally proposed, to 480 g/l as suggested by USEPA comment.

Section (C)(4) has been modified to lower surface preparation solvent limits from 200 g/L to 25 g/L. Strippers have been separated out and remain at the original solvent limit.

Section (C)(5) capture and control system combined efficiency has been increased from 85 percent to 90 percent.

Work practices have been strengthened for cleanup of spray equipment.

D. PROPOSED RULE SUMMARY

This section gives a brief overview of the proposed amendments to Rule 1114.

Minor format changes have been made throughout which are for consistency and not substantive. These changes include, but are not limited to, capitalization of defined terms, relocation of commonly defined terms to Rule 102, updating cross references, and including the complete titles of referenced rule and test method titles.

Section (B) has been modified to update existing definitions, remove unused definitions, remove definitions that are contained in Rule 102, and add definitions for specialty coating categories.

Definitions removed because they are already included in Rule 102, or are being relocated to Rule 102: Adhesive; Aerosol Coating Product; Air Assisted Airless Spray; Air Pollution Control Officer (APCO); Capture Efficiency; Clear Topcoat; Coating; Compliance Assurance Monitoring; Control Device Efficiency; Dip Coat; Exempt Compounds; Flow Coat; Grams of VOC Per Liter of Coating Less

Water and Less Exempt Compounds (VOC Content); Grams of VOC Per Liter of Material; High Volume Low Pressure (HVLP); Ink; Multi-colored Coating; Overall Control Efficiency (C.E.); Repair Coating; Roll Coater; Stains; Stripper; Touch-up Coating; Transfer Efficiency; Volatile Organic Compound (VOC).

Definitions removed/no longer used: Conventional Air Spray; Theoretical Potential Emissions.

Definitions modified to provide clarity or consistency: Refinished Wood Products.

New definitions: Conversion Varnish; Crackle Lacquer; Faux Finishes; Imitation Wood Grain; Leaf Finishes; Low-Volume, Low-Pressure (LVLP); Medium Density Fiberboard (MDF) Coatings; New Wood Product; Tint; VOC Content.

Section (C) Table 1 has been separated to two tables representing "New Wood Products" coating limits and "Refinishing, Repairing, Preserving or Restoring" coating limits. Subsection (C)(1)(b) as originally proposed was removed pursuant to USEPA comment. The limit for Low-Solids Stains, Toners and Washcoats in subsection (C)(2)(a) Table 2 was lowered from 700 g/L as originally proposed, to 480 g/l as suggested by USEPA comment.

Subsection (C)(3) application methods have been expanded to include several additional methods, as well as stipulating that alternative application methods have been modified to meet transfer efficiency equal or better to that achieved by HVLP.

Subsection (C)(4) has been expanded to separate strippers from surface preparation and cleanup VOC limits. Additional cleaning methods have been added. Surface preparation and cleanup VOC limit has been lowered to 25 g/L, while strippers remain at 200 g/L.

Subsection (C)(5) has been modified to increase capture and control device efficiency from 85 percent to 90 percent and also includes a new requirement for an approved Operation and Maintenance Plan requirement for the emission control device.

Subsection (D)(1) cross reference corrected from (C)(2)(b) to (C)(1)(b). Subsection (D)(1)(b) has been reworded for clarity.

Subsections (D)(2), (5), (6) and (7) have been removed as the referenced sections have expired or are no longer applicable.

Subsection (D)(3) as originally proposed has been removed pursuant to USEPA comment. Other recently approved SIP-approved rules do not contain this exemption. A similar exemption in SCAQMD Rule 1136 was only applicable through July 1998.

New Subsections (D)(5), (6), (7) and (8) have been added for consistency with PCAPCD Rule content as SIP approved for RACT.

Subsection (F)(1)(a)(i) (F)(1)(c) have additional recordkeeping requirements to strengthen recordkeeping responsibility. Subsection (F)(1)(c) has been modified for clarity.

Subsection (F)(2)(b) has had "or" qualifier removed.

Section (G) has been modified to incorporate the full title of referenced test methods, and current version date as applies. Several calculations that were previously incorporated in the definition section have been relocated to this section, specifically: Control Device Efficiency; Grams of VOC Per Liter of Coating Less Water and Exempt Compounds; Grams of VOC Per Liter of Material; Overall Control Efficiency. Calculation of VOC Content has been added, including separate methods for calculating "Regulatory VOC Content" and "Actual VOC Content" to support different requirements found in Tables I and 2. A calculation for "VOC Composite Partial Vapor Pressure" has been added in support of the Stripper provision found in Section (C)(4)(b)(ii). Subsection (G)(3) has been modified by removing unnecessary redundant language.

E. FCAA 110(1) (42 U.S.C. §7410(1)) ANALYSIS

Rule 1114 was originally adopted 03/02/92, and subsequently amended 02/22/95 and 11/25/96. The SIP approved version of Rule 1114 is the 11/25/96 amendment, approved at 63 FR 44132, 08/18/98. This version of the rule is the only rule applicable in the MDAQMD, including the Blythe/Palo Verde area of Riverside County that was acquired from the SCAQMD. The 110(l) analysis will be based on the differences between the 11/25/96 MDAQMD amendment and the current proposed amendment.

Several definitions have been relocated to existing Rule 102. Many terms are defined in multiple district rules. In addition, many of these definitions are exact or near exact duplicates of each other. Pursuant to Governing Board direction regarding streamlining, the Air Pollution Control Officer (APCO) has determined that shifting common definitions to Rule 102 and updating them for consistency will improve clarity. Reference to Rule 102 has been added to Rule 1114. Several definitions specific to Rule 1114 have been added or updated for consistency other RACT rules. Changes in definitions are more current and specific; therefore not a relaxation.

VOC coating categories and limits remain as exiting or have been derived from other district rules determined to fulfill RACT. Section (C)(1) and (C)(2) have been modified to include separate limits for "New" and "Refinishing, Repairing, Preserving or Restoring" coating limits. This approach was approved in two district rules that were recently determined by USEPA to fulfill RACT. "Refinishing, Repairing, Preserving or Restoring Wood Products" coating operations were previously exempted, so all limits, although higher that the "New" coatings limits, capture previously unregulated coating categories, thus increasing the rule stringency.

Additional application requirements have been added to (C)(3) for consistency with other district RACT rules. Application methods are all required to have transfer efficiency at

least equal to or better than HVLP as defined. As such, all application methods are at least as stringent to the existing requirements of the rule, therefore not a relaxation.

Section (C)(4) has been modified to lower surface preparation solvent limits from 200 g/L to 25 g/L. Strippers have been separated out and remain at the original solvent limit. A VOC limit for stripping was not specified in the previous amendment of Rule 1114. The District has proposed to retain a VOC limit for strippers of 200 grams or less of VOC per liter of material. This limit is not a relaxation, as strippers would previously have been assigned to the surface preparation and cleanup solvent category of 200 grams or less of VOC per liter of material. Strippers are separately defined with specific use restrictions. The provision for allowing a separate stripper limit is consistent with several rules deemed to meet RACT. Work practices in (C)(4) have been strengthened for cleanup of spray equipment. These practices expand and strengthen existing work practices.

Section (C)(5) capture and control system combined efficiency has been increased from 85 percent to 90 percent. This increase in efficiency strengthens the rule.

Exemption Section (D) has been strengthened by removing provisions no longer applicable, as well as removing exemptions for refinishing operations now covered by Section (C) Table 2.

Additional recordkeeping requirements have been added to provide more comprehensive information available for review.

Section (G) calculations have been incorporated. Several definitions were moved to Rule 102 and the accompanying calculation was correctly moved to this section for consistency with District rule format. Several other definitions were added in support of new provisions. These changes and updates do not relax the rule.

No part of the rule has been omitted, except those sections that have been superseded by date, or updated to current language. These minor changes and updates do not relax the rule.

F. SIP HISTORY

1. SIP History.

On July 1, 1993 the MDAQMD was formed pursuant to statute. Pursuant to statute it also retained all the rules and regulations of the San Bernardino County Air Pollution Control District (SBCAPCD) until such time as the Governing Board of the MDAQMD wished to adopt, amend or rescind such rules. The MDAQMD Governing Board, at its very first meeting, reaffirmed all the rules and regulations of the SBCAPCD. Rule 1114 was adopted 03/02/92 and subsequently amended 02/22/95 and 11/25/96. This 1996 version was also applicable to the Riverside County portion of the MDAQMD which was acquired from the SCAQMD on 07/01/94. The 11/25/96 version was determined to fulfill RACT

and was included in the State Implementation Pan (SIP) for the MDAQMD (63 FR 44132, 08/18/98).

2. SIP Analysis.

The District will request CARB to submit the proposed amendments to Rule 1114 to replace the 1996 SIP version. While not specifically mentioned in the Direct Final Rule for the 11/25/96 version of Rule 1114 (63 FR 44132, 08/18/98), the District assumes that the approval action was for both the San Bernardino County portion of the MDAB and the Blythe/Palo Verde Valley portion of Riverside County, and that SCAQMD Rule 1136 – *Wood Furniture and Cabinet Coatings* was thereby removed from the SIP for the Blythe/Palo Verde Valley portion of Riverside County.

This submission is necessary to satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors.

Former H&S Code §39614(d) (expired by its own terms on January 1, 2011) required the adoption of the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by the CARB. In addition, this document required the adoption of Reasonably Available Control Measures (RACM) for PM. The proposed amendments to Rule 1114 satisfy both of these requirements as detailed in §(V)(B).

Since there are previously existing SIP rules for this category the District will request that they be superseded. In order to replace existing SIP rules the District is required to show that the proposed amendments are not less stringent than the provisions currently in the SIP. Proposed Rule 1114 is more stringent than the previous SIP version because the amendments update transfer efficiency requirements, coating limits, control device efficiency, work practices, VOC content for strippers and surface preparation materials, and test methods. Therefore, the proposed amendments to Rule 1114 are more stringent than the 1996 version of the rule.

Appendix "A"

Rule 1114 – Wood Products Coating Operations Iterated Version

The iterated version is provided so that the changes to an existing rule may be easily found. The manner of differentiating text is as follows:

- 1. <u>Underlined text</u> identifies new or revised language.
- 2. Lined out text identifies language which is being deleted.
- 3. Normal text identifies the current language of the rule which will remain unchanged by the adoption of the proposed amendments.
- 4. [Bracketed italicized text] is explanatory material that is not part of the proposed language. It is removed once the proposed amendments are adopted.

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(Adopted: 03/02/92; Amended: 02/22/95; Amended: 11/25/96;

Amended: mm/dd/yy)

Rule 1114 Wood Products Coating Operations

(A) General

- (1) Purpose
 - (a) The purpose of this Rule is to limit the emission of Volatile Organic Compounds from Wood Products Coating Application Operations.
- (2) Applicability
 - (a) This Rule applies to Wood Products Coating Application Operations within the Mojave Desert Air Quality Management District.

(B) Definitions

The definitions contained in District Rule 102 – Definition of Terms shall apply unless the term is otherwise defined herein: [Definitions that are commonly used throughout the MDAQMD rule book have been relocated to existing Rule 102.](1) For the purposes of this rule, the following definitions shall apply:

- (a) "Adhesive" any substance that is capable of bonding surfaces together by attachment. [See Rule 102.]
- (b) "Aerosol Coating Product" a pressurized Coating product that dispenses product ingredients by means of a propellant, and is packaged in a disposable can for hand-held application. [See Rule 102.]
- (3) "Air Assisted Airless Spray" Equipment used to apply Coatings that use fluid pressure to atomize Coating and air pressure between 0.1 and 20 psig to adjust the spray pattern. [Derived from Placer County APCD (PCAPCD) Rule 236 §203.] [See Rule 102.]
- (c) "Air Pollution Control Officer" (APCO) the person appointed to the position of Air Pollution Control Officer of the District pursuant to the provisions of California Health & Safety Code §40750, and his or her designee. [See Rule 102.]
- (d1) "Binders" Nnon-volatile polymeric Oorganic Mmaterials (resins) which form the surface film in Coating applications.
- (e) "Capture Efficiency" the ratio, expressed as a percentage, of the weight of the VOC in the effluent stream entering the control device to the weight of VOC

emitted from Wood Products Coating Application Operations, both measured simultaneously, and calculated by the following equation: [See definition in Rule 102. Calculation moved to $\S(G)$.]

Capture Efficiency =
$$\frac{W_c}{W_L} \times 100$$

Where:

We = weight of VOC entering control device

We = weight of VOC emitted

(£2) "Clear Sealer" - aA Coating containing Binders, but not opaque pigments, which seals the Wood Products prior to application of the subsequent Coatings.

- (g) "Clear Topcoat" a Coating which contains resins and Binders but not opaque pigments and which is specifically formulated to form a transparent or translucent solid protective film. [See Rule 102.]
- (h) "Coating" a material which is applied to a surface and which forms a film in order to beautify and/or protect such surface. [See Rule 102.]
- ((3i) "Coating Application Operations" are aA combination of Coating application steps which may include use of spray guns, flash-off areas, spray booths, ovens, conveyors, and/or other eEquipment operated for the purpose of applying Coating materials.
- (j) "Compliance Assurance Monitoring" total equipment, mechanism(s), and/or technique(s) used to demonstrate and insure compliance with cControl dDevice eEfficiency requirements. Such monitoring is used to analyze and/or provide a permanent record of process parameters, such as temperatures, pressures and flow rates. [See Rule 102.]
- (<u>4k</u>) "<u>Composite Wood</u>" <u>aA</u> manufactured material consisting of tightly compressed wood fibers bonded with resins which includes, but is not limited to, particleboard, fiberboard and hardboard.
- (1) "Control Device Efficiency" the ratio, expressed as a percentage, of the weight of the VOC removed by the control device from the effluent stream entering the control device to the weight of VOC in the effluent stream entering the control device, both measured simultaneously, and calculated by the following equation: [See definition in Rule 102. Calculation moved to §(G).]

Control Device Efficiency =
$$\frac{(W_{\epsilon} - W_{\epsilon})}{W_{\epsilon}} \times 100$$

- We = weight of VOC entering control device
- Wa = weight of VOC discharged from control device
- (m) "Conventional Air Spray" a spray cCoating method in which the Coating is atomized by mixing it with compressed air at an air pressure greater than 10 pounds per square inch (gauge) at the point of atomization. Airless and aAir aAssisted aAirless sSpray technologies are not Conventional Air Spray because the Coating is not atomized by mixing it with compressed air. [Definition no longer used. §(D)(7)(a) deleted.]
- (5) "Conversion Varnish" A topcoat or sealer which is comprised of an alkyd or other resin, blended with amino resin, in a homogeneous liquid that, when acid catalyzed and applied, hardens by evaporation and polymerization. [Derived from San Diego County APCD (SDCAPCD) Rule 67.11 §(c)(8).]
- (6) "Crackle Lacquer" A clear or pPigmented tTopcoat intended to produce a cracked or crazed appearance when dry. [Derived from Placer County APCD (PCAPCD) Rule 236 §212.]
- (n7) "Custom Replica Furniture" new New, made-to-order furniture that looks like antique furniture, rather than new furniture. It features detailed wood carvings and bruising of the wood to simulate antique furniture.
- (o) "Dip Coat" to dip an object into a vat of Coating material and drain off any excess Coating. [See Dip Coater definition Rule 102]
- (p) "Exempt Compounds" those compounds listed in 40 CFR 51.100(S)(1). [See Rule 102.]
- (8) "Faux Finishes" A finish intended to simulate a surface other than wood, including sand, slate, marble, metal, metal flake, or leather. [Derived from PCAPCD Rule 236 §220.]
- (92) "<u>Filler</u>" a-A material which is applied to a Wood Product, and whose primary function is to build up, or fill the voids and imperfections in the Wood Product to be coated.
- (r) "Flow Coat" to coat an object by flowing a stream of Coating over an object and draining off any excess Coating. [See Flow Coater definition Rule 102]
- (s) "Grams of VOC Per Liter of Coating Less Water and Less Exempt Compounds" (VOC Content) the weight of VOC per combined volume of VOC and Coating solids, calculated by the following equation: [See definition in Rule 102. Calculation moved to §(G).]

$$\frac{Grams\ VOC_{(less\ water\ and\ exempt\ compounds)}}{Liter\ of\ Coating} = \underbrace{\begin{bmatrix} \left(W_s - W_w - W_{es}\right) / \\ V_m - V_w - V_{es} \end{bmatrix}}_{}$$

Where:

$\mathbf{W}_{\mathbf{s}}$	=	weight of volatile compounds in grams
W _w	=	weight of water in grams
₩ _{es}	=	weight of exempt compounds in grams
$V_{\rm m}$	=	volume of material in liters
$V_{\rm w}$	=	volume of water in liters
\mathbf{V}_{es}	=	volume of exempt compounds in liters

(t) <u>"Grams of VOC Per Liter of Material"</u> - the weight of VOC per volume of material, calculated by the following equation: *[See definition in Rule 102. Calculation moved to §(G).]*

Grams of VOC per Liter of Material =
$$\begin{bmatrix} (W_s - W_w - W_{es}) / V_m \end{bmatrix}$$

$$W_s$$
 = weight of volatile compounds in grams

 W_w = weight of water in grams

 W_{es} = weight of exempt compounds in grams

 V_m = volume of material in liters

- (#10) "<u>High-Solids Stains</u>" Stains containing more than <u>one</u> (1) pound of solids per gallon by weight.
- (v) "High-Volume Low-Pressure (HVLP) Spray" to spray a coating by means of a gun that operates between 0.1 and 10.0 psig air pressure, not to exceed 10 psig, measured at the air cap of the Coating application system, and a permanent liquid Coating pressure of not more than 50 psig. [See Rule 102.]

- (11) "Imitation Wood Grain" A hand applied finish that simulates the appearance of a specific natural wood grain. [Derived from PCAPCD Rule 236 §225.]
- (w) "Ink" a fluid that contains dyes and/or colorants and is used to make markings but not to protect surfaces [See Rule 102.]
- -(12) "Leaf Finishes" A finish used in conjunction with metal leaf or foil. [Derived from PCAPCD Rule 236 §227.]
- (13) "Low-Volume, Low-Pressure" (LVLP) Spray eCoating application Equipment with air pressure between 0.1 and 10.0 psig and air volume less than 15.5 cfm per spray gun and which operates at a maximum fluid delivery pressure of 50 psig.

 [Derived from PCAPCD Rule 236 §229.]
- (*14) "Low-Solids Stains, Toners and Washcoats" Stains, Toners and Washcoats containing one (1) pound of solids per gallon, or less, by weight.
- (15) "Medium Density Fiberboard (MDF) Coatings" The initial eCoating which is applied directly to the surface of MDF. MDF is a wood product composed of tightly compressed wood fibers bonded with resins, and has a density greater than 45 pounds per cubic foot. [Derived from SDCAPCD Rule 67.11 §(c)(20).]
- (y16) "Mold-Seal Coating" tThe initial Coating applied to a new mold or repaired mold to provide a smooth surface which, when coated with a mold release eCoating, prevents products from sticking to the mold.
- (17) "New Wood Product" A Wood Product which has not been previously coated.

 A Wood Product from which Coatings have been removed to repair flaws in initial Coating applications is a New Wood Product. [Derived from SDAPCD Rule 67.11 §(c)(20) and added in response to USEPA verbal comment 12/21/17.]
- (z) "Multi-Colored Coating" a Coating which exhibits more than one color when applied, and which is packaged in a single container and applied in a single coat. [See Rule 102.]
- (aa) "Overall Control Efficiency" (C.E.) the ratio, expressed as a percentage, of the weight of the VOC removed by the emission control system to the total weight of VOC emitted from Coating Application Operations, both measured simultaneously, calculated by the following equations: [See definition in Rule 102. Calculation moved to §(G).]

$$C.E. = \frac{(W_c - W_{cc})}{W_c} \times 100$$

$$C.E. = \frac{(Capture\ Efficiency) \times (Control\ Device\ Efficiency)}{100}$$

Where:

- W_e = weight of VOC entering control device
- W_e = weight of VOC discharged from the control device
- W_e = weight of VOC emitted
- (bb18) "Panel" a-A flat piece of wood or Wood Products, usually rectangular, and used inside homes and mobile homes for wall decorations.
- (ee19) "Pigmented Primers, Sealers and Undercoats" opaque Opaque Coatings which contain bBinders and colored pigments which are formulated to hide the wood surface, that are applied prior to the topcoat to provide a firm bond, level the wood product surface, or seal the wood product surface.
- (dd20) "<u>Pigmented Topcoat</u>" a-A final opaque Coating which contains bBinders and colored pigments, and is specifically formulated to hide the wood surface and form a solid protective film.
- (ee21) "Rate Per Day" the The amount applied between 12:00 a.m. and 11:59 p.m. on the same calendar day.
- _(ff) "Reactive Diluent" a liquid which is a VOC during application and one which, through chemical or physical reactions such as polymerization, becomes an integral part of a finished Coating. For Coatings that contain Reactive Diluents, the VOC Content of the Coating is determined after curing. The VOC Content shall be calculated by the following equation: [Definition not used.]

$$VOC\ Content_{Coatings\ that\ contain\ Reactive\ Diluents} = \frac{W_s - W_w - W_{es}}{V_m - V_w - V_{es}}$$

- W_s = weight of volatile compounds not consumed during curing in grams
- W_w = weight of water not consumed during curing in grams
- W_{es} = weight of exempt compounds not consumed during curing in grams
- V_m = volume of the material prior to reaction in liters
- V_w = volume of water not consumed during curing in liters

- V_{es} = volume of exempt compounds not consumed during curing in liters
- (gg22) "Refinished Wood Product" the recoating of A post-consumer Wood Products which has had some or all of the eCoatings removed, and to which new eCoatings are applied in order to preserve or restore the post-consumer wood product to its original condition. A wood product from which eCoatings have been removed to repair flaws in initial eCoatings applications is not a refinished wWood pProduct. that have been previously coated. [Derived from SDAPCD Rule 67.11 \$(c)(24). Modified to clarify and specify the limits provided in "Limits for VOC Content of Coatings for Refinished Wood Products."
- (hh) "Repair Coating" a Coating used to re-coat portions of a product which has sustained mechanical damage to the Coating following normal painting operations. [See Rule 102.]
- (ii) "Roll Coater" a series of mechanical rollers that forms a thin Coating film on the surface of roller, which is applied to a substrate by moving the substrate underneath the roller. [See Rule 102.]
- (jj23) "Shutter" an-An exterior screen or cover for a window, usually hinged and often fitted with louvers. This includes non-functional Shutters.
- (kk24) "Simulated Wood Materials" mMaterials, such as plastic, glass, metal, that are made to give a wood-like appearance or are processed like Wood Products.
- (H25) "Stencil Coating" an An iInk or a pigmented Coating which is rolled or brushed onto a template or stamp in order to add identifying letters and/or numbers to Wood Products.
- (mm) "Stains" Coatings which are formulated to change the color of a surface but not completely conceal the surface, so that the grain is still visible. [See Rule 102.]
- (nn) "Stripper" a liquid used to remove cured Coatings, cured Inks and/or cured Adhesives. [See Rule 102.]
- (00) "Theoretical Potential Emissions" the maximum capacity of a facility to emit any air pollutant under its physical and operational design, based on 8,760 hours of operation per year and before the use of air pollution abatement equipment.

 [Definition no longer used.]
- (26) "Tint" A colorant added in small quantities to a Stain to achieve a particular color for the finished product. [Derived from PCPCD Rule 236 §247.]
- (pp276) "Toner" a-A Wash Coat which contains Binders and dyes or pigments to add & Tint to a coated surface.

- (qq) "Touch-up Coating" a Coating used to cover minor Coating imperfections appearing after the main Coating operation. [See Rule 102.]
- (rr7) "Transfer Efficiency" the ratio of the weight of Coating solids deposited on an object to the total weight of Coating solids used in a Coating application step, expressed as a percentage. [See Rule 102.]
- (ss) "Volatile Organic Compound (VOC)" any volatile compound of carbon, excluding methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, ammonium carbonate, and Exempt Compounds. [See Rule 102.]
- (288) VOC Content The weight of VOC per volume of Coating. VOC Content is VOC Regulatory, as defined in subsection (G)(4)(a)(i), for all eCoatings except those in the Low Solids category. For eCoating in the Low Solids category, the VOC Content is VOC Actual, as defined in subsection (G)(4)(a)(ii). If the eCoating is a multi-component product, the VOC Content is VOC Content as mixed or catalyzed. If the eCoating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing. [Derived from MDAQMD Rule 1113. Both methods of calculation are necessary for rule implementation.]
- (#299) "Wash Coat" a Coating that contains no more than 1.0 pounds of solids per gallon, by weight, which is used to seal wood surfaces, prevent undesired staining, and control penetration.
- (uu3050) "Wood Products" those Those surface coated room furnishings which include cabinets (kitchen, bath, and vanity), tables, chairs, beds, sofas, sShutters, art objects, and any other coated object made of solid wood and/or Composite Wood and/or made of Simulated Wood Material used in combination with solid wood or Composite Wood.

(C) Requirements

- (1) Limits for VOC Content of Coatings & Adhesives for New Wood Products
 - (a) Except as provided in subsections (C)(4), or (C)(5), no Person shall apply any Coatings to a new wood product if such materials have a VOC Content exceeding the applicable limits specified in Table 1. The VOC Content of Coatings, except Low-Solids Stains, Toners, Washcoats and Solvents shall be determined in accordance with subsection (G)(4)(a)(i) and (G)(2)(a). The VOC Content of Low-Solids Stains, Toners, Washcoats and Solvents shall be determined in accordance with subsection (G)(4)(a)(ii) and (G)(2)(a). VOC limits expressed in grams VOC per liter of eCoating shall be used.

<u>Table 1</u> <u>VOC Content of Coatings and Adhesives for New Wood Products</u>

<u>Coating</u>	Current Limit	On and After MM/DD/YYYY (1 year after date of adoption)
	g/l (lb/gal) Less Water and Less Exempt Compounds	g/L (lb/gal) Less Water and Less Exempt Compounds
General [New category]	<u>N/A</u>	<u>275 (2.3)</u>
Clear Sealers [No change]	<u>275 (2.3)</u>	<u>275 (2.3)</u>
Clear Topcoats [No change]	<u>275 (2.3)</u>	275 (2.3)
Pigmented Primers, Sealers and Undercoats		
[No change]	<u>275 (2.3)</u>	<u>275 (2.3)</u>
Pigmented Topcoats [No change]	<u>275 (2.30</u>	<u>275 (2.3)</u>
Fillers [No change]	<u>275 (2.3)</u>	275 (2.3)
High-Solids Stains [No change]	350 (2.9)	350 (2.9)
Inks [No change]	500 (4.2)	500 (4.2)
Mold-Seal [No change]	<u>750 (6.3)</u>	750 (6.3)
Multi-Colored Coatings [No change]	275 (2.3)	275 (2.3)
Low-Solids Stains, Toners and Washcoats [Changed to Actual VOC calculation]	120 (1.0)	<u>120 (1.0)</u>
Adhesives [No change]	<u>250 (2.1)</u>	<u>250 (2.1)</u>
Conversion Varnish [New Category]	<u>N/A</u>	550 (4.6)

- (b) Notwithstanding the VOC limits specified in this section, a Person may apply a sealer with a VOC Content not exceeding 680 grams per liter, provided that the Topcoat used on the same wood product does not exceed 275 grams per liter. [Derived from Placer County APCD Rule 236 §302.1.]—[Provision removed at the request of USEPA to retain rule stringency.]
- (2) Limits for VOC Content of Coatings & Adhesives for Refinishing, Repairing,
 Preserving or Restoring Wood Products

[This type of operation was previously exempted, so all limits, although higher than for Coating of new wWood pProducts, capture previously unregulated category limits and are thereby not a relaxation of the rule. Language and VOC limits derived from Placer County APCD Rule 236 and San Diego County APCD Rule 67.11.]

(a) Except as provided in subsections (C)(4), or (C)(5), no Person shall apply any Coatings to refinish, repair, preserve or restore a wood product if such materials have a VOC Content exceeding the applicable limits specified in Table 2. The VOC Content of Coatings, except Low-Solids Stains,

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Toners, Washcoats and Solvents shall be determined in accordance with subsection (G)(4)(a)(i) and (G)(2)(a). The VOC Content of Low-Solids Stains, Toners, Washcoats and Solvents shall be determined in accordance with subsection (G)(4)(a)(ii) and (G)(2)(a). VOC limits expressed in grams VOC per liter of eCoating shall be used.

<u>Table 2</u>

<u>VOC Content of Coatings and Adhesives for Refinishing,</u>

<u>Repairing, Preserving or Restoring Wood Products</u>

	g/l (lb/gal) Less Water
	and Less Exempt
Coating	Compounds
<u>General</u>	<u>420 (3.5)</u>
<u>Clear Topcoats</u>	<u>680 (5.7)</u>
Conversion Varnishes	<u>550 (4.6)</u>
<u>Fillers</u>	<u>500 (4.2)</u>
High-Solids Stains	<u>700 (5.8)</u>
<u>Inks</u>	<u>500 (4.2)</u>
Medium Density Fiberboard (MDF)	
Coatings	<u>680 (5.7)</u>
Mold-Seal Coating	<u>750 (6.3)</u>
Multi-Colored Coatings	<u>680 (5.7)</u>
Pigmented Coatings	<u>600 (5.0)</u>
Sealers	<u>680 (5.7)</u>
Low-Solids Stains, Toners and Washcoats	
[Limit adjusted pursuant to USEPA]	
<u>comment of 12/22/17.]</u>	<u>480 700 (5.84.0)</u>
Any other Low Solids Coatings	480 (4.0)

Any owners and/or operators of Wood Products Coating Application Operations shall not apply any Coating or Adhesive to a Wood Product which has a VOC Content, including any VOC containing material added to the original Coating supplied by the manufacturer, which exceeds the applicable limit specified below, unless emissions to the atmosphere are controlled by air pollution abatement equipment with an Overall Control Efficiency of at least 85 percent. Any Coating subject to this rule that meets either of the two VOC Content limit formats (grams per liter or lb/gal) is in compliance with this subsection. [Emission Control System Requirements moved to (C)(5).]

(i) —	<u>LIMITS</u>
	—Grams of VOC Per Liter of Coating,
	Less Water and Less Exempt Compounds (VOC Content)

	On and	On and After 7/1/2005

		On and 7/1/		On and After 7/1/2005
Coating	Current Limit g/L (lb/gal)	Column I or g/L (lb/gal)	Column II g/L (lb/gal)	g/L (lb/gal)
Clear Sealers	680 (5.7)	550 (4.6)	680 (5.7)	275 (2.3)
Clear Topcoat	680 (5.7)	550 (4.6)	275 (2.3)	275 (2.3)
Pigmented Primers, Sealers and Undercoats	600 (5.0)	550 (4.6)	600 (5.0)	275 (2.3)
Pigmented Topcoats	600 (5.0)	550 (4.6)	275 (2.3)	275 (2.3)

Effective July 1, 1997, a person or facility shall use Coatings on Wood Products that comply with either all VOC Content limits in Column I or all VOC Content limits in Column II. A person or facility that applies a Pigmented Primer, Sealer or Undercoat, but not a Clear Topcoat or Pigmented Topcoat, to a Wood Product shall be subject to column I for that product.

_(ii) Notwithstanding the requirements of subsection (C)(1)(a)(i), a person or facility that applies a topcoat and a primer, sealer or undercoat to a Shutter may, until July 1, 2005, choose to comply with the VOC Content limits specified below for that Shutter:

[This section has expired by its terms.]

LIMITS
Grams of VOC Per Liter of Coating,
Less Water and Less Exempt Compounds (VOC Content)

Coating	g/L (lb/gal)
Clear Sealers	275 (2.3)
Clear Topcoat	680 (5.7)
Pigmented Primers, Sealers -& Undercoats	275 (2.3)
Pigmented Topcoats	600 (5.0)

(iii) LIMITS Grams of VOC Per Liter of Coating, Less Water and Less Exempt Compounds (VOC Content)

		On and After 7/1/97	On and After 7/1/2005
Coating	Current Limit g/L (lb/gal)	g/L (lb/gal)	g/L (lb/gal)
Fillers	500 (4.2)	500 (4.2)	275 (2.3)

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		On and After 7/1/97	On and After 7/1/2005
High Solid Stains	700 (5.8)	550 (4.6)	350 (2.9)
Inks	500 (4.2)	500 (4.2)	500 (4.2)
Mold Seal Coatings	750 (6.3)	750 (6.3)	750 (6.3)
Multi-Colored Coatings	685 (5.7)	685 (5.7)	275 (2.3)
Low Solids Stains, Toners and Washcoats	800 (6.7)	4 80 (4.0)	120 (1.0)
Adhesives	250 (2.1)	250 (2.1)	250 (2.1)

- (32) Transfer Efficiency [Updated to incorporate application methods deemed to meet current federal RACT contained in PCAPCD Rule 236 and SDCAPCD Rule 67.11.]
 - (a) A Pperson or Ffacility shall not apply Coatings to Wood Products subject to the provisions of this rule unless the Coating is applied with properly operating eEquipment, according to manufacturer's suggested guidelines, and by the use of one of the following methods:
 - (i) Flow Coat; or
 - (ii) Dip Coat; or
 - (iii) High-Volume Low-Pressure (HVLP) spray;, or
 - (iv) Low-Volume Low-Pressure spray Equipment; or
 - (iv) Paint brush; or
 - (vi) Hand roller; or
 - (vii) Roll Coater; or
 - (viii) Air-aAssisted aAirless Spray(for Touch-Up and Repair Coating only);
 - (ix) Electrostatic Application Equipment; or [Defined in Rule 102.]
 - (xvii) Such other Coating application methods as are demonstrated to the Air Pollution Control Officer to be capable of achieving at least 65 percent have a Transfer Efficiency equal to or better than achieved by HVLP spraying and for which written approval of the Air Pollution Control Officer has been obtained. [Modification proposed, consistent with current language in recently amended Rule 1115.]
- (34) <u>Strippers, Surface Preparation,</u> Clean-up Solvent and Equipment Cleaning
 - (a) The requirements of this Section shall apply to any Pperson using Solvent for surface preparation and cleanup.
 - (i) A Pperson shall not use an organic compound for surface preparation, except Strippers, with a VOC Content in excess of

- 25200 gGrams of VOC pPer lLiter of mMaterial (0.211.67 pounds per gallon). [Solvent limit lowered to meet federal RACT limit as contained in PCAPCD Rule 236 and SDCAPCD Rule 67.11.]
- _(ii) A person shall not use a Stripper on Wood Products unless it contains less than 350 grams of VOC per liter of material.

 [Relocated to (C)(4)(b) below.]
- (iii) A <u>Pperson shall use closed</u>, <u>non-leaking</u>, <u>and non-absorbent</u> containers for the storage or disposal of cloth or paper used for <u>sS</u>olvent surface preparation and cleanup.
- (iiiv) A Pperson shall store fresh or spent sSolvent in closed containers.
- (iv) A Pperson shall not use organic compounds for the cleanup of spray eEquipment, including paint lines, unless eEquipment for collecting the cleaning compounds and minimizing their evaporation to the Aatmosphere is used.
- (v) Spray gun nozzles only, may be soaked in Solvent-based materials for cleaning, provided the container is not more than five (5) gallons in size, and is kept tightly covered at all times except when accessing the container. [Derived from PCAPCD Rule 236 §306.1.]
- (vi) A Person shall not use Solvent based VOC-containing materials
 for the clean-up of spray Equipment used in wWood pProducts
 eCoating aApplication eOperations, unless the spray Equipment is
 disassembled and cleaned in an enclosed gun cleaner. [Derived
 from PCAPCD Rule 236 §306.4.]
- (b) A Person shall not use a Stripper on wood products unless: [Derived from San Diego County APCD Rule 67.11.]
 - (i) The sStripper contains less than 200 gGrams of VOC pPer lLiter of mMaterial; or
 - (ii) The VOC composite partial vapor pressure for the sStripper is 2 mm Hg (0.04 psia) or less at 68 F (20 C), as calculated pursuant to subsection (G)(5).

(5) Add-On Control System

- (a) In lieu of complying with the VOC content limitations in subsection (C)(1), (C)(2), and/or (C)(4) above, air pollution control Equipment with a capture and control system combined efficiency of at least 90 percent, as determined pursuant to subsections (G)(2)(b) and (G)(2)(c) of this Rule, may be used. [Control device requirement moved from previous subsection (C)(1)(a).]
- (b) A Person using control Equipment pursuant to (C)(5)(a) shall submit to the APCO for approval an Operation and Maintenance Plan for the proposed emission control device and emission collection system and

receive approval prior to operation of the control Equipment. Such Plan shall: [Operation and Maintenance Plan derived from SDAPCD Rule 67.11 and PCAPCD Rule 236.]

- (i) Identify all key system operating parameters. Key system operating parameters are those necessary to ensure compliance with subsection (C)(5)(a), such as temperature, pressure, and/or flow rate; and
- (ii) Include proposed inspection schedules, anticipated ongoing maintenance, and proposed recordkeeping practices regarding key operating system parameters.

(46) Prohibition of Specifications

(a) Any Pperson shall not specify the use in the District of any Coating to be applied to any Wood Products subject to the provisions of this rule that does not meet the limits and requirements of this rule. The requirements of this paragraph shall apply to all written or oral contracts.

(57) Compliance Statement Requirement

(a) The manufacturer of Coatings subject to this rule shall include a statement of VOC Content as supplied on data sheets; including Coating components, expressed in grams per liter or pounds per gallon, excluding water and exempt <u>sSolvents</u>.

(D) Exemptions

- (1) The provisions of subsections (C)(1)(a), (C)(21)(b), and (C)(2)(a), (C)(3)(a) and (C)(4) of this rule shall not apply to: [Typographical cross reference error corrected pursuant to USEPA verbal comment 12/21/17.]
 - (a) The use of Aerosol Coating Products.
 - (b) Facilities whose Rate Per Day of Coating use is less than one gallon, including any VOC-containing materials added to the original Coating as supplied by the manufacturer. Only Coatings subject to this rule shall be included in the calculation of Rate Per Day., or; Coating Application Operations that emit not more than 3 pounds of VOCs per day and not more than 200 pounds of VOCs per calendar year.

Facilities whose Rate Per Day of Coating use is less than one (1) gallon including any VOC-containing materials added to the original Coating as supplied by the manufacturer (only Coatings subject to this rule shall be included in this calculation), and whose Wood Coating Application

Operations do not emit more than 3 pounds of VOCs per day and not more

- than 200 pounds of VOCs per calendar year. [Subsection reworded for clarity after discussion with USEPA 12/21/17.]
- (c) Laminating of fiberglass, metal, or plastic sheets to wood Panels.
- (d) The application of Coatings to musical instruments.
- (e) The application of Coatings to billiard tables.
- _(2) The July 1, 1997 limits which are set forth in subsection (C)(1)(a) shall not apply to: [Expired by its terms.]
 - (a) Wood Products Coating Application Operations which emit not more than 3 pounds of VOC per hour, before the use of air pollution abatement equipment; or
 - (b) Wood Products Coating Application Operations which emit not more than 15 pounds of VOC per day, before the use of air pollution abatement equipment; or
 - (c) Facilities that do not exceed 10 tons per year Theoretical Potential Emissions.
- _(3) The provisions of subsection (C)(1)(a) shall not apply to any Refinishing operations necessary for preservation, to return the Wood Product to original condition, to replace missing furniture to produce a matching set, or to produce Custom Replica Furniture. _[This exemption removed for stringency purposes pursuant to USEPA comment 12/22/17. Other recently approved SIP-approved rules do not contain this exemption. A similar exemption in SCAQMD Rule 1136 was only applicable through July 1998 so removal will maintain consistency between the adjacent Districts.]
- (44) The provisions of subsection (C)(1)(a), (C)(1)(b), and (C)(2)(a) shall not apply to Touch-up and Repair Coatings or Stencil Coatings.
- (5) For the purposes of claiming an exemption pursuant to subsections (D)(2)(a) or (D)(2)(b), hourly or daily emissions shall be considered from January 1, 1996 forward. [The referenced sections are expired and proposed for removal from this draft, and no longer applicable.]
- Once a facility exceeds 3 pounds of VOC per hour, or 15 pounds of VOC per day, respectively, it will remain subject to the July 1, 1997 limits even if its emissions later fall below the applicability threshold. [The referenced limits are no longer applicable and proposed for removal from this draft.]
- (7) Notwithstanding the provisions of subsection (C)(2)(a), a person or facility may use:

- (a) Any spray equipment that uses only Coatings that comply with the July 1, 2005 VOC Content limits; or
- (b) Any spray equipment, except Conventional Air Spray, that uses only Coatings that contain 550 g/L, or less, of VOC Content.
- (85) Any Ffacility classified as exempt or claiming to be exempt under this Section (D), shall meet the record keeping requirements of this rule so as to be able to certify the exemption status.
- (6) Residential non-commercial operations are exempt from the provisions of this rule. [Derived from PC APCD Rule 236 §104.1.]
- (7) Facilities which use of less than 55 gallons per year of wWood pProducts

 Coatings and/or sStrippers (singly or in any combination) are exempt from the provisions of this rule with the exception of Section (F). [Derived from PCAPCD Rule 236 §104.6.]
- (8) Coatings used to provide the following finishes are exempt from the provision of subsection (C)(1)(a), (C)(1)(b), and (C)(2)(a), provided that the records are maintained as specified in Section (F): [Derived from PCAPCD Rule 236 §104.7.]
 - (a) Crackle Lacquers;
 - (b) Faux Finishes;
 - (c) Imitation Wood Grain;
 - (d) Leaf Finishes.
- (9) Tints applied to sStains in quantities not to exceed one (1) pint of Tint in any operating day are exempt from all the provisions of this rule, provided that the records are maintained as specified in Section (F): [Derived from PCAPCD Rule 236 §104.8.]
- (E) Administrative Requirements
 - (1) Rule 442 Applicability
 - (a) Any Ceoating, Ceoating Operation, or Ffacility which is exempt from all or a portion of the VOC Content limits of this rule shall comply with the provisions of Rule 442 unless compliance with the limits specified in this rule are achieved.

(F) Monitoring and Records

- (1) Coating Records
 - (a) Any Pperson subject to Sections (C)(1)(a), (C)(3)(a), (D)(1)(b) or (D)(2)this rule shall comply with the following requirements:
 - (i) The Pperson shall maintain and have available during an inspection, a current list of Coatings in use which provides all of the Coating data necessary to evaluate compliance, including the following information, as applicable:
 - 1. Coating, catalyst, and reducer used.
 - 2. Mmix ratio of components used.
 - 3. VOC Content of Coating as applied.
 - 4. A data sheet, material list, or invoice giving material name, manufacturer, identification, material application and VOC content.
 - (ii) The Pperson shall maintain records on a daily basis including:
 - 1. Coating and mix ratio of components used in the Coating; and
 - 2. Qquantity of each Coating applied.
 - (iii) The Pperson shall maintain records on a daily basis showing the type and amount of sSolvent used for cleanup, surface preparation, and paint removal.
 - (b) Notwithstanding the provisions of subsection (F)(1)(a), a Pperson or Facility which exclusively uses Coatings formulations compliant with subsection (C)(1)(a), (C)(1)(b), and (C)(2)(a) may maintain usage records on a monthly basis.
 - (c) Persons using Stains and/or Tints and subject to this Rule shall maintain records on a monthly basis that provide the following information:
 - (i) Name, description, container size and actual VOC Content of any ***T**ints used to color **sS**tains.
 - (ii) Usage of any Tint is limited to one (1) pint in any operating day.

 Records of any \mathfrak{t} Tint use shall be maintained on a daily basis.

 [Please refer to $\mathfrak{S}(D)(8)$ for one (1) pint limit.]
- (2) Compliance Assurance Monitoring
 - (a) Each Coating Application Operation subject to subparagraph (C)(1)(a), (C)(1)(b) or (C)(2)(b) which is using air pollution abatement eEquipment to meet the control requirement shall:
 - (i) <u>U</u>utilize Compliance Assurance Monitoring, as approved by the APCO. Each monitoring device(s), mechanism and/or technique

- shall be calibrated/maintained in a manner approved by the APCO; and
- (ii) Mmaintain and produce daily records of key system operating parameters and maintenance procedures which will demonstrate continuous operation and compliance of the air pollution abatement eEquipment during periods of emissions-producing activities. Key system operating parameters are those necessary to ensure compliance with VOC content of eCoating requirements, such as temperatures, pressures and flow rates.
- (b) Compliance with subsection (C)(15)(a), shall be determined by compliance testing as prescribed in subsections (G)(2)(b) and (c) and/or by evaluating Compliance Assurance Monitoring data. ["Or" qualifier removed pursuant to discussion with USEPA, 12/21/17.]
- (3) All records for the previous five (5) year period maintained and produced pursuant to this Section shall be retained and available for inspection by the APCO upon request.

(G) Test Methods

- (1) A violation of the limits contained in this Rule, as determined by any one of these test methods, shall constitute a violation of this Rule.
- (2) The following specified test methods shall be used to determine compliance with the provisions of this Rule. *[Full title of methods included pursuant to EPAs Little Blue Book, and updated to reference current date of versions as needed.]*
 - (a) Determination of VOC Content and solids content: Samples of Coatings and sSolvent as specified in Section (C) $\frac{(1)(a)}{(1)(a)}$ shall be analyzed as prescribed by EPA Reference Method 24 <u>— Determination of Volatile</u> Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings for VOC Content and solids content (without correction for Exempt Compounds) and ASTM D4457-85, 91 - Standard Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas *Chromatograph*, or ARB Method 432 – *Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings* (09/12/1989) for determination of emissions of Exempt Compounds. Perfluorocarbon compounds shall be assumed to be absent from a product or process unless a manufacturer or Ffacility Opperator identifies the specific individual compounds (from the broad classes of perfluorocarbon compounds) and the amounts present in the product or process and provides a test method acceptable to EPA and ARB which can be used to quantify the specific compounds.

- (b) Determination of Emissions: For any Oowners and/or Ooperators who choose to comply with the provisions of Section (C)(1)(a)-), (C)(1)(b) or (C)(2)(a) through the use of air pollution abatement equipment, emissions of VOCs shall be measured as prescribed by EPA Reference Method 25 Gaseous Nonmethane Organic Emissions for determination of VOC emissions (without correction for exempt eCompounds) and EPA Method 18 Volatile Organic Compounds by Gas Chromatography, or ARB Method 422 Determination of Volatile Organic Compounds in Emissions from Stationary Sources (Exempt VOCs) (02/16/2017) for measuring emission of eExempt eCompounds.
- (c) Determination of Overall Control Efficiency: The Overall Control Efficiency of air pollution abatement eEquipment shall be determined by a minimum of three sampling runs conducted according to USEPA's technical guidance document "Guidelines for Determining Capture Efficiency", January 9, 1995.
- The following test method is recommended for use in determining Transfer Efficiency of alternative application methods: Demonstration of Transfer Efficiency of alternative application methods subject to subsection (C)(23)(a) shall be conducted in accordance with South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User" (May 24, 1989). [Superfluous language removed for clarity pursuant to discussion with USEPA, 12/21/17.]

(4) Calculation of VOC Content:

- (a) For the purpose of determining compliance with the VOC Content limits in Section (C), the VOC Content of a Coating shall be determined by using the procedures in subsection (i) or (ii) below, as appropriate. If the manufacturer does not recommend thinning, the VOC Content must be calculated for the product as supplied. The VOC Content of a Tint Base shall be determined without Colorant that is added after the Tint Base is manufactured. Effective (1 year after date of adoption), if the Coating is a multi-component product, the VOC Content must be calculated as mixed or catalyzed. Effective (1 year after date of adoption), if the Coating containes Silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC Content must include the VOCs emitted during curing. [Derived from MDAQMD Rule 1113 for language and format, consistent with PCAPCD Rule 236)
 - (i) Regulatory VOC Content The weight of VOC per combined volume of VOC and eCoating solids, shall be calculated by the following equation:

$$VOC_{Regulatory} = \frac{W_v - W_w - W_{ec}}{V_m - V_w - V_{ec}}$$

<u>VOC_{Regulatory}</u> = <u>Weight of VOC per liter of eCoating, less</u>

water and less Exempt Compounds

 $\underline{W}_{\underline{v}}$ = Weight of all volatile compounds, in grams

 \underline{W}_{w} = \underline{W}_{eight} of water, in grams

<u>Wec</u> = <u>Weight of Exempt Compounds, in grams</u>

 \underline{V}_{m} $\underline{=}$ <u>Volume of eCoating material, in liters</u>

 \underline{V}_{w} $\underline{\underline{}}$ Volume of water, in liters

 \underline{V}_{ec} = \underline{V} olume of Exempt Compounds, in liters

(ii) Actual VOC Content – The weight (in grams) of VOC per liter of wWood pProducts eCoating material is expressed as grams VOC per liter of material, and shall be calculated by the following equation:

$$VOC_{Actual} = \frac{W_v - W_w - W_{ec}}{V_m}$$

<u>VOC</u> _{Actual}	=	Weight of VOC per liter of eCoating
W _v	=	Weight of all volatile compounds, in grams
$\underline{\mathbf{W}}_{\underline{\mathbf{w}}}$	=	Weight of water, in grams
$\underline{\mathbf{W}}_{\underline{\mathbf{ec}}}$	=	Weight of Exempt Compounds, in grams
<u>V</u> _m	=	Volume of eCoating material, including any added VOC-containing Solvents or reducers but excluding any colorant added to Tint the base in liters

(5) VOC Composite Partial Vapor Pressure: [Derived from PCAPCD Rule 236 §250.]

$$PP_C = \frac{\sum_{i=1}^{n} (W_i)(VP_i)(MW_i)}{\frac{W_w}{MW_w} + \frac{W_e}{MW_e} + \sum_{i=1}^{n} WSUB \frac{i}{MW_i}}$$

<u>PP</u> _c	=	VOC composite partial pressure at 68 °F (20 °C), in mm Hg
$\underline{\mathbf{W}_{\underline{i}}}$	=	Weight of the "I" _{th} VOC compound, in grams
$\underline{\mathbf{W}}_{\underline{\mathbf{w}}}$	Ξ	Weight of water, in grams
$\underline{\mathbf{W}}_{\underline{\mathbf{e}}}$	Ξ	Weight of Exempt Compounds, in grams
<u>MW</u> _i	=	Molecular weight of the "I" _{th} VOC compound, in (g/g-mole)
$MW_{\underline{w}}$	=	Molecular weight of water, in (g/g-mole)
<u>MW</u> _e	Ξ	Molecular weight of Exempt Compound, in (g/g-mole)
<u>VP</u> _i	=	Vapor pressure of the "I" _{th} VOC compound at 68 °F (20 °C), in mm Hg

(6) Control Device Efficiency shall be calculated using the following equation:

Control Device Efficiency =
$$\frac{(W_c - W_a)}{W_c} \times 100$$

Where:

<u>Wc</u> = <u>Weight of VOC entering control device</u>

<u>Wa</u> = <u>Weight of VOC discharged from control device</u>

(7) Grams of VOC Per Liter of Coating Less Water and Less Exempt

Compounds" (VOC Content) shall be calculated using the following equation:

$$G_{v} = \frac{W_{s} - W_{w} - W_{es}}{V_{m} - V_{w} - V_{es}}$$

$\underline{\mathbf{G}}_{\underline{\mathbf{v}}}$	=	Grams of VOC per Liter of Coating Less Water and Less Exempt Compounds

$\underline{\mathbf{W}}_{\underline{\mathbf{s}}}$	=	Weight of volatile compounds in grams
$\underline{\mathbf{W}}_{\underline{\mathbf{w}}}$	Ξ	Weight of water in grams
$\underline{\mathbf{W}}_{\underline{e}\underline{s}}$	=	Weight of Exempt Compounds in grams
$\underline{\mathbf{V}}_{\underline{\mathbf{m}}}$	=	Volume of material in liters
$\underline{\mathbf{V}}_{\underline{\mathbf{w}}}$	=	Volume of water in liters
$\underline{\mathbf{V}}_{\mathrm{es}}$	Ξ	Volume of Exempt Compounds in liters

(8) Grams of VOC Per Liter of Material shall be calculated using the following equation:

$$G_{v} = \frac{W_{s} - W_{w} - W_{es}}{V_{m}}$$

Where:

 $\underline{G}_{\underline{v}} \equiv \underline{G}_{\underline{v}} = \underline{G}_{\underline{v}} =$

Exempt Compounds

 $\underline{W}_{\underline{s}} = \underline{Weight of volatile compounds in grams}$

 $\underline{W}_{w} \equiv \underline{W}_{eight}$ of water in grams

 $\underline{W}_{es} \equiv \underline{Weight of Exempt Compounds in grams}$

 $\underline{V}_{\underline{m}} = \underline{Volume of material in liters}$

(9) Overall Control Efficiency (C.E.) shall be calculated using the following equations: [Updated for consistency.]

Capture Efficiency (%) =
$$\left(\frac{W_c}{W_e}\right) \times 100$$

Where:

Weight of VOC entering control device

Weight of VOC emitted

<u>We</u>

Control Device Efficiency (%) =
$$\frac{(W_c - W_a)}{W_c} \times 100$$

Where:

$\underline{\mathbf{W}_{\mathbf{c}}}$	=	Weight of VOC entering control device
$\underline{\mathbf{W}}_{\underline{\mathbf{a}}}$	=	Weight of VOC discharged from the control device

$$C.E.(\%) = \frac{(Capture\ Efficiency) \times (Control\ Device\ Efficiency)}{100}$$

See SIP Table at http://www.mdaqmd.ca.gov/

[SIP Information: Approved: 08/18/98, 63 FR 44132, 40 CFR 52.220(c)(244)(i)(C); Approved 61 FR 18962, 04/30/96]

MDAQMD Rule 1114

1114-23

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Appendix "B"Public Notice Documents

- 1.
- Proof of Publication Daily Press, December 22, 2017 Proof of Publication Riverside Press Enterprise, December 22, 2017 2.

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PROOF OF PUBLICATION

(2015.5 C.C.P.)

STATE OF CALIFORNIA, County of San Bernardino

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the publisher of the DAILY PRESS, newspaper of general circulation, published in the City of Victorville, County of San Bernardino, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of San Bernardino, State of California, under the date of November 21, 1938, Case number 43096, that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

December 22

All in the year 2017.

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated this: 22nd day of December,

Signature
Leslie Jacobs

This space is the County Clerk's Filing Stamp

RECEIVED MOJAVE DESERT AQMD CLERK OF THE BOARD

JAN 0 3 2018

BY

Proof of Publication of NOTICE OF HEARING

TICE OF HEARING
ROTICE IS HERRBY
GIVEN IN all the
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Governing board of the
Mojave Desert Air Quality Man Desert Air Quali

Rule 1101 - POTITIONA
Cement Kilns.

SAID HEARING will be
conducted in the Governing Board Chambers located at the MDAQM/D offices 14306 Park Avenue,
2310 where all interest
and be heard. Copies of
the proposed rules and
the associated staff reports are on file and may
be obtained from the Executive Office Manager at
the MDAQM/D offices.
Written comments may
be submitted to Brad
Polirez, APCO at the
above office address.
Written comments should
be received no later than
January 18, 2018 to be
considered. If you have
any questions regarding
any questions regarding
the staff of the control of the
control of the control of the
control of the control of the
proposed of

sion 5756. If you have questions regarding Rule 1161 you may contact Alan De Salvio at (760) 245-11661 extension 6726. Traducción esta disponible por solicitud.

The proposed amendment of Rule 102 – Definition of Terms is necessary to shift common definitions used in the MDAQMD rulebook to Rule 102, and to update them for consistency and clarity.

Rules 1114, 1157, and 1161 are proposed for amendment to satisty 42 U.S.C. §\$7511a (Federal Clean Air Act (FCAA) \$182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) and for major sources of ozone precursors.

Pursuant to the California Environmental Quality Act (CEQA) the MDAQMD has determined that a Categorical Exemption (Class 8 – 14 Cal. Code Reg §15308) applies and has prepared a Notice of Exemption for this action.

Published in the Daily Press December 22, 2017 (F-66)

THE PRESS-ENTERPRISE

1825 Chicago Ave, Suite 100 Riverside, CA 92507 951-684-1200 951-368-9018 FAX

PROOF OF PUBLICATION (2010, 2015.5 C.C.P)

Publication(s): The Press-Enterprise

PROOF OF PUBLICATION OF

Ad Desc.: /

I am a citizen of the United States. I am over the age of eighteen years and not a party to or interested in the above entitled matter. I am an authorized representative of THE PRESS-ENTERPRISE, a newspaper in general circulation, printed and published daily in the County of Riverside, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under date of April 25, 1952, Case Number 54446, under date of March 29, 1957, Case Number 65673, under date of August 25, 1995, Case Number 267864, and under date of September 16, 2013, Case Number RIC 1309013; that the notice, of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

12/22/2017

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Date: December 22, 2017 At: Riverside, California

Legal Advertising Representative, The Press-Enterprise

MOJAVE DESERT AQMD 14306 PARK AVE ATTN: D. HERNANDEZ VICTORVILLE, CA 92392

Ad Number: 0011052493-01

P.O. Number:

Ad Copy:

NOTICE OF HEARING

NOTICE IS HEREBY GIVEN that the Governing Board of the Molave Desert Air Quality Management District (MDAQMD) will conduct a public hearing on January 22, 2018 of 10:00 A.M. to conduct the proposed amendment of Rule 102 – Definition of Terms, Rule 1114—Wood Products Coating Operations, Rule 1157 – Boilers and Process Heaters; and Rule 1161 – Portland Cement Kilns.

Heaters; and Rule 1161 – Portland Cement Klins.

SAID HEARING will be conducted in the Governing Board Chambers located at the MDAGMD offices 14306 Park Ayenue, Victorville, CA 92392-2310 where all interested persons may be present and be deard. Copies of the proposed rules and the associated staff reports are on file and may be obtained from the Executive Office Manager Brad Poilers, APCO at the above office oddress, Virtual and the sacrollary of the properties of the proper

The proposed amendment of Rule 102 – Definition of Terms is necessary to shift common definitions used in the MDAQMD rulebook to Rule 102, and to update them for consistency and clarify.

Rules 1114, 1157, and 1161 are proposed for amendment to satisfy 42 U.S.C. §87310 (Federal Clean Air Act (FCAA) \$1820 which requires that azone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) and for major sources of ozone precursors.

Pursuant to the California Environmental Quality Act (CEQA) the MDAQMD has determined that a Calegorical Exemption (Class 8 – 14 Cal. Code Reg §13308) applies and has prepared a Notice of Exemption for this action.

12/22

RECEIVED MOJAVE DESERT AQMD CLERK OF THE BOARD

JAN 0 3 2018

BY

Appendix "C"Public Comments and Responses

1. USEPA comments Re: MDAQMD Rule 1114, 12/22/17

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Tracy Walters

 From:
 LEVIN, NANCY < Levin.Nancy@epa.gov>

 Sent:
 Friday, December 22, 2017 10:23 AM

 To:
 Tracy Walters; Alan De Salvio

Cc: Lo, Doris; Bushey, Douglas; Law, Nicole

Subject: RE: MDAQMD Rule 1114

Dear Alan and Tracv.

Thank you for the opportunity to comment on draft Rule 1114 – Wood Products Coating Operations. We have not yet completed our review of Rule 1114. However, we appreciated your time this week to talk about some initial issues/questions we've identified so far regarding exemptions. Per your request, we also are providing you initial comments on an additional exemption and some of the rule limits (See below). Please feel free to contact me with any questions at 415-972-3848. We look forward to providing you a comprehensive list of comments once we've fully reviewed the rule.

Thank you, Nancy Levin

- Section D.2. Exemptions for Custom Replica Furniture The 11/15/17 draft rule includes an
 exemption for Custom Replica Furniture. We have reviewed other SIP-approved rules for the wood
 products coating category. Most other rules (e.g., San Diego 67.12, Placer 236, South Coast 1136,
 Ventura 74.30) rules do not appear to exempt custom replica furniture. For stringency purposes, we
 recommend either removing exemption D.2 for custom replica furniture, further limiting the
 exemption, or explaining why this exemption is consistent with RACT for the Mojave Desert.
- In our preliminary review of MD Rule 1114 Table 1 and Table 2, we've reviewed other wood coating rules and in some cases found more stringent limits.
 - a. Sealers In Table 1, the limit is 275 g/L, which is generally consistent with most rules wood coating rules (some have a more stringent limit of 240 g/L). However, the rule also provides that the sealer limit can be up to 680 g/L provided the topcoat used on the same wood product does not exceed 275 g/L (See (C)(1)(b)). While Placer Rule 236 rule contains a similar provision, no other wood coating rules we have reviewed appear to contain this provision. For stringency, we recommend deleting (C)(1)(b).
 - b. Low-Solids Stains, Toners and Washcoats In Table 2, the limit is 700 g/L. Most other rules we have reviewed contain a limit of 480 g/L. We recommending lowering the limit to 480 g/L.
 - c. High Solids Stains In Table 1, the limit is 350 grams per liter (g/L). In reviewing other wood coating rules we find that some rules contain a 350 g/L limit and some contain a limit of 240 g/L. We recommend considering lowering the limit to 240 g/L if feasible at this time.

Nancy Levin | 415-972-3848 | Rules and Planning Air Division | Region IX | U.S. Environmental Protection Agency

1

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- 1. District Response to USEPA Comment, 12/22/17
- 1. Exemption removed as suggested. Other recently approved SIP-approved rules do not contain this exemption. A similar exemption in SCAQMD Rule 1136 was only applicable through July 1998 so removal will maintain consistency between the adjacent Districts.
- 2a. This proposed provision was removed as suggested.
- 2b. The limit for Low-Solids Stains, Toners and Washcoats was adjusted from 700 g/L to 480 g/L as suggested.
- 2c. The limit for High-Solids Stains was not reduced. The limit in adjacent SCAQMD contains the same limit of 350 g/L in Rule 1136. Placer County APCD TSD for Rule 236, October 2011, states that rule provisions meet RACT, and again mentions that industry was never able to comply with the limit of 240 g/L USEPA suggests be adopted.

Please note that other rule changes were made as discussed in conference call between USEPA and MDAQMD on 12/21/2017. These changes have been noted in the rule as *[italicized]* text.

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Appendix "D"California Environmental Quality Act Documentation

- Notice of Exemption San Bernardino County Notice of Exemption Riverside County 1.
- 2.

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Mojave Desert Air Quality Management District

14306 Park Avenue, Victorville, CA 92392-2310

NOTICE OF EXEMPTION Visit our web site: http://www.mdaqmd.ca.gov 760.245.1661 • fax 760.245.2699

TO:

County Clerk

FROM: Mojave Brad Poiriez, Executive Director

POSTED Air Quality Management District

385 N. Arrowhead, 2nd Flot Pn: 01. -14306 Park Ave

San Bernardino, CA 92415 oved On: 03/13/18 Victorville, CA 92392-2310

310-01292018-057 X MDAQMD Clerk of the Governing Board

San Bernardino Count®ATE FILED

PROJECT TITLE: Amendment of Rule 1114 – Wood Products Coating Operations.

PROJECT LOCATION - SPECIFIC: San Bernardino County portion of the Mojave Desert Air Basin and Palo Verde Valley portion of Riverside County.

PROJECT LOCATION - COUNTY: San Bernardino and Riverside Counties

DESCRIPTION OF PROJECT: The proposed amendment of Rule 1114 – Wood Products Coating Operations will satisfy 42 U.S.C. §§7511a (Federal Clean Air Act (FCAA) §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) documents issued by United States Environmental Protection Agency (USEPA) for "major sources" of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NOx) which are ozone precursors. The proposed amendment of Rule 1114 also satisfies the provisions of former Health & Safety Code (H&S Code) §39614(d) (expired by its own terms on January 1, 2011) which requires the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by the California Air Resources Board (CARB).

NAME OF PUBLIC AGENCY APPROVING PROJECT: Mojave Desert AQMI

NAME OF PERSON OR AGENCY CARRYING OUT PROJECT: Mojave Desert AQMD

EXEMPT STATUS (CHECK ONE)

Ministerial (Pub. Res. Code §21080(b)(1); 14 Cal Code Reg. §15268) Emergency Project (Pub. Res. Code §21080(b)(4); 14 Cal Code Reg. §15269(b)) X Categorical Exemption – Class 8 (14 Cal Code Reg. §15308)

REASONS WHY PROJECT IS EXEMPT: The proposed amendments to Rule 1114 are exempt from CEQA review because the amendments will not create any adverse impacts on the environment. The proposed rule amendments are more stringent than the previous rule version. Because there is no potential that the amendments might cause the release of additional air contaminants or create any adverse environmental impacts, a Class 8 categorical exemption (14 Cal. Code Reg. §15308) applies.

LE	ÁD	AGENCY	CONTACT PERSON:	Brad Poiriez	PHONE:	(760)	245-16	61

TITLE: Executive Director DATE: January 22, 2018

DATE RECEIVED FOR FILING:

Town of Apple Valley City of City of Hesperia air quality management district Clerk/Recorder TO:

Mojave Desert Air | E-201800086 14306 Par

County of Riverside Peter Aldana

FILED/POSTED

RECEIVED MOOVICESCHE EMPMPTI

FEB 0 5 2018 FROM: Mojave Brad Poiriez, Executive Director

Riverside County 3470 12th St. Riverside, CA 93701

Air Quality Management District 14306 Park Ave Victorville, CA 92392-2310

X MDAQMD Clerk of the Governing Board

PROJECT TITLE: Amendment of Rule 1114 - Wood Products Coating Operations.

PROJECT LOCATION - SPECIFIC: San Bernardino County portion of the Mojave Desert Air Basin and Palo Verde Valley portion of Riverside County.

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NAME OF PUBLIC AGENCY APPROVING PROJECT: Mojave Desert AQMD

NAME OF PERSON OR AGENCY CARRYING OUT PROJECT: Mojave Desert AQMD

EXEMPT STATUS (CHECK ONE)

Ministerial (Pub. Res. Code §21080(b)(1); 14 Cal Code Reg. §15268) Emergency Project (Pub. Res. Code §21080(b)(4); 14 Cal Code Reg. §15269(b))

X Categorical Exemption – Class 8 (14 Cal Code Reg. §15308)

REASONS WHY PROJECT IS EXEMPT: The proposed amendments to Rule 1114 are exempt from CEQA review because the amendments will not create any adverse impacts on the environment. The proposed rule amendments are more stringent than the previous rule version. Because there is no potential that the amendments might cause the release of additional air contaminants or create any adverse environmental impacts, a Class 8 categorical exemption (14 Cal. Code Reg. §15308) applies.

LEAD AGENCY CONTACT PERSO	ON: Brad Poiriez PHONE: (76	0) 245-1661
SIGNATURE: Bulla	TITLE: Executive Director DATE:	January 22, 2018
DATE RECEIVED FOR FILING:		

D-4

Appendix "E"Bibliography

The following documents were consulted in the preparation of this staff report.

- 1. San Diego County Air Pollution Control District Rule 67.11 Wood Products Coating Operations, 6/12/12
- 2. United States Environmental Protection Agency Region IX Air Division Technical Support Document for EPA's Direct Final Rulemaking for the California State Implementation Plan San Diego County Air Pollution Control District Rule 67.11, Wood Products Coating Operations, February 2013.
- 3. Placer County Air Pollution Control District Rule 236 *Wood Products Coating Operations*, 10-14-10.
- 4. United States Environmental Protection Agency Region IX Air Division Technical Support Document for EPA's Direct Final Rulemaking for the California State Implementation Plan Placer County Air Pollution Control District Rule 236, Wood Products Coating Operations, October 2011.
- 5. Control of Volatile Organic Emissions from Wood Furniture Manufacturing Operations, EPA-453/R-96-007 April 1996.
- 6. *Control Techniques Guidelines for Flat Wood Paneling Coatings*, EPA 453/R-06-004 September 2006
- 7. *Control Techniques Guidelines: Industrial Cleaning Solvents*, EPA 453/R-06-001 September 2006
- 8. Control of Volatile Organic Emissions from Existing Stationary Sources Volume VII: Factory Surface Coating of Flat Wood Paneling, EPA 450/2-78-032 June 1978

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Mojave Desert Air Quality Management District

14306 Park Avenue, Victorville, CA 92392-2310 760.245.1661 • fax 760.245.2699

Visit our web site: http://www.mdaqmd.ca.gov Brad Poiriez, Executive Director

February 12, 2018

Carol Sutkus
State of California
Environmental Protection Agency
Air Resources Board
P. O. Box 2815
Sacramento, California 95812

Project Title: Amendment of MDAQMD Rule 1115 – Metal Parts & Products Coating Operations

Dear Ms. Sutkus:

The Mojave Desert Air Quality Management District (MDAQMD) requests that the California Air Resources Board submit amended Rule 1115 – *Metal Parts & Products Coating Operations*, to the United States Environmental Protection Agency (USEPA) for inclusion in the State Implementation Plan (SIP).

The amendments to Rule 1115 – *Metal Parts & Products Coating Operations* are necessary to satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Technology Guidelines (CTG) and for major sources of ozone precursors.

The District requests CARB submit amended Rule 1115 to replace the 1996 SIP version. While not specifically mentioned in the Direct Final Rule for the 04/22/1996 version of Rule 1115 (62 FR 67002, 12/23/1997), the District assumes that the approval action was for both the San Bernardino County portion of the MDAB and the Blythe/Palo Verde Valley portion of Riverside County, and that SCAQMD Rule 1107 – *Coating of Metal Parts and Products* was thereby removed from the SIP for the Blythe/Palo Verde Valley portion of Riverside County. (Please refer to Section (F) of the Staff Report for a complete SIP History and Analysis discussion).

If you have any questions regarding this submittal, please contact me at (760) 245-1661, extension 6726, or Tracy Walters at extension 6122. Please note that all documents required for a complete submission were sent electronically on February 12, 2018.

Sincerely,

Alan LDe Salvio

Deputy Director – Mojave Desert Operations

AJD/tw

CARB SIP Submittal Request MD Rule 1115 021218

SIP COMPLETENESS CHECKLIST

(Electronic Format)

*** TO BE COMPLETED BY DISTRICT AND RETURNED TO ARB ***

All rules submitted to the EPA as State Implementation Plan (SIP) revisions must be supported by certain information and documentation for the rule packages to be deemed complete for review by the EPA. Rules will not be evaluated for approvability by the EPA unless the submittal packages are complete. To assist you in determining that all necessary materials are included in rules packages sent to the ARB for submittal to the EPA, please fill out the following form and include it with the rule package you send ARB. See the ARB's <u>Guidelines on the Implementation of the 40 CFR 51, Appendix V</u>, for a more detailed explanation than is provided here. Adopted rules and rule amendments should be checked against U.S. EPA's <u>Guidance Document for Correcting Common VOC & Other Rule Deficiencies</u> (Little Blue Book, August 21, 2001) to ensure that they contain no elements which will result in disapproval by EPA.

District: Mojave Desert Air Quality Management District

Rule No: <u>1115</u>

Rule Title: Metal Parts & Products Coating Operations

Date Adopted or Amended: 01/22/2018

ADMINISTRATIVE MATERIALS

Note: All documents should be in electronic format. Items that have signatures, initials, or stamps may be scanned.

<u>Attached</u>	Not <u>Attached</u>	<u>N/A</u>	
			COMPLETE COPY OF THE RULE: Provide an unmarked copy of the entire rule as adopted or amended by your District Board.
			UNDERLINE AND STRIKEOUT COPY OF THE RULE: If an amended rule, provide a complete copy of the rule indicating in underline and strikeout format all language which has been added, deleted, or changed since the rule was last adopted or amended. (See Staff Report Appendix A)
			COMPLETE COPY OF THE REFERENCED RULE(S): For any rule which includes language specifically referencing another rule, a copy of that other rule must also be submitted, unless it has already been submitted to EPA as part of a previous SIP submittal.
			PUBLIC NOTICE EVIDENCE: Include a copy of the local newspaper clipping certification(s), stating the date of publication, which must be at least 30 days before the hearing. As an alternative, include a copy of the actual published notice of the public hearing as it appeared in the local newspaper(s). In this case, however, enough of the newspaper page must be included to show the date of publication. The notice must specifically identify by title and number each rule adopted or amended. (See Staff Report Appendix B)
			RESOLUTION/MINUTE ORDER: Provide the Board Clerk certified resolution or minute order. This document must include certification that the hearing was held in accordance with the information in the public notice. It must also list the rules that were adopted or amended, the date of the public hearing, and a statement of compliance with California Health and Safety Code Sections 40725-40728 (Administrative Procedures Act).
			PUBLIC COMMENTS AND RESPONSES: Submit copies of written public comments made during the notice period and at the public hearing. Also submit any written responses prepared by the District staff or presented to the District Board at the public hearing. A summary of the public comments and responses is adequate. If there were no comments made during the notice period or at the hearing, please indicate N/A to the left. (See Staff Report Appendix C)

SIP COMPLETENESS CHECKLIST (Electronic Format)

*** TO BE COMPLETED BY DISTRICT AND RETURNED TO ARB ***

	Ш	RULE EVALUATION FORM: See instructions for completing the Rule Evaluation Form and the accompanying sample form.
		NON-EPA TEST METHODS: Attach all test methods that are referenced in your rule that do not appear in 40 CFR 51, 60, 61, 63, or have not been previously submitted to EPA. EPA methods used in other media such as SW846 for solid waste are not automatically approved for air pollution applications. Submittal of test methods that are not EPA-approved should include the information and follow the procedure described in Region 9's "Test Method Review & Evaluation Process."
		MODELING SUPPORT: Provide if appropriate. In general, modeling support is not required for VOC and NOx rules to determine their impacts on ozone levels. Modeling is required where a rule is a relaxation that affects large sources (≥ 100 TPY) in an attainment area for SO2, directly emitted PM10, CO, or NOx (for NO2 purposes). In cases where EPA is concerned with the impact on air quality of rule revisions which relax limits or cause a shift in emission patterns in a nonattainment area, a reference back to the approved SIP will be sufficient provided the approved SIP accounts for the relaxation and provided the approved SIP used the current EPA modeling guidelines. If current EPA modeling guidelines were not used, then new modeling may be required.
		ECONOMIC AND TECHNICAL JUSTIFICATION FOR DEVIATIONS FROM EPA POLICIES: The District staff report or other information included with the submittal should discuss all potential relaxations or deviations from RACT, RACM, BACT, BACM, enforceability, attainment, RFP, or other relevant EPA requirements. This includes, for example, demonstrating that exemptions or emission limits less stringent than the presumptive RACT (e.g., a CTG) meet EPA's 5 percent policy, and demonstrating that all source categories exempted from a RACM/BACM rule are de minimus according to EPA's RACM/BACM policy. (See Staff Report)
		ADDITIONAL MATERIALS: Provide District staff reports and any other supporting information concerning development of the rule or rule changes. This information should explain the basis for all limits and thresholds contained in the rule.

APCD/AQMD RULE EVALUATION FORM - Page 1 (Electronic Format)

GENERAL INFORMATION

District: Mojave Desert Air Quality Management District
Rule No(s): 1115 Date adopted/Amended/Rescinded: January 22, 2018
Rule Title(s): Metal Parts & Products Coating Operations
Date Submitted to ARB: February 12, 2018
If an Amended Rule, Date Last Amended (or Adopted): April 22, 1996
Is the Rule Intended to be Sent to the U.S. EPA as a SIP Revision? 🛛 Yes 🗌 No (If No, do not complete remainder of form)
District Contact: <u>Tracy Walters</u> Phone Number: <u>(760) 245-1661 x6122</u> E-mail Address: <u>twalters@mdaqmd.ca.gov</u>
Narrative Summary of New Rule or Rule Changes: ☐ New Rule ☐ Amended Rule
The amendments to Rule 1115 satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors. While the District does not have sources meeting the threshold in the CTGs it does have major facilities which coat metal parts and products and thus a rule is required. Additionally, the District is amending this rule to satisfy a prior commitment to implement the provisions of H&S Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and cost-effective control measures for Particulate Matter from a list of potential local control measures promulgated by CARB. The proposed amendments update rule definitions; transfer efficiency requirements; coating limits; control device efficiency; work practices; VOC content for strippers and surface preparation materials; test methods; and, record retention requirements. Pollutant(s) Regulated by the Rule (Check): ROG (NOx) SO2 TAC (name): TAC (name):
II. <u>EFFECT ON EMISSIONS</u>
Complete this section ONLY for rules that, when implemented, will result in quantifiable changes in emissions. Attach reference(s) for emission factor(s) and other information. Attach calculation sheet showing how the emission information provided below was determined.
Net Effect on Emissions: ☐ Increase ☐ Decrease ☐ N/A
Emission Reduction Commitment in SIP for this Source Category: N/A
Inventory Year Used to Calculate Changes in Emissions: N/A Area Affected: N/A
Future Year Control Profile Estimate (<i>Provide information on as many years as possible</i>): N/A

APCD/AQMD RULE EVALUATION FORM - Page 2 (Electronic Format)

Baseline Inventory in the SIP for the Control Measure: N/A							
Emissions Reduction Commitment in the SIP for the Control Measure: <u>N/A</u>							
Revised Baseline Inventory (if any): N/A							
Revised Emission Reduction Estimate (if developed): <u>N/A</u>							
Note that the district's input to the Rule Evaluation Form will not be used as input to the ARB's emission forecasting and planning.							
III. <u>SOURCES/ATTAINMENT STATUS</u>							
District is: ☐ Attainment ☐ Nonattainment ☐ Split							
Approximate Total Number of Small (<100 TPY) Sources Affected by this Amendment: 5							
Percent in Nonattainment Area: 100%							
Number of Large (≥ 100 TPY) Sources Controlled: 0 Percent in Nonattainment Area: 0%							
Name(s) and Location(s) (city and county) of Large (\geq 100 TPY) Sources Controlled by Rule (Attach additional sheets as necessary): N/A							
IV. <u>EMISSION REDUCTION TECHNOLOGY</u>							
Does the Rule Include Emission Limits that are Continuous? ☐ Yes ☐ No							
If Yes, Those Limits are in Section(s) N/A of the Rule.							
Other Methods in the Rule for Achieving Emission Reductions are: Control device efficiency, work practices, surface preparation and cleanup solvent VOC limits.							
V. <u>OTHER REQUIREMENTS</u>							
The Rule Contains:							
Emission Limits in Section(s): <u>C</u> Work Practice Standards in Section(s): <u>C</u> Recordkeeping Requirements in Section(s): <u>F</u> Reporting Requirements in Section(s): <u>F</u>							

APCD/AQMD RULE EVALUATION FORM - Page 3

(Electronic Format)

VI.	INIPACT ON A	IR QUALITY PLAN	
⊠ N	o Impact	☐ Impacts RFP	☐ Impacts attainment

IMPACT ON AID OUALITY DI ANI

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Discussion: The proposed amendments update rule definitions; transfer efficiency requirements; coating limits; control device efficiency; work practices; VOC content for strippers and surface preparation materials; test methods; and, record retention requirements. A requirement for prohibition of sale has been reinserted in the rule as suggested in the August 1997 Technical Support Document for EPA's Notice of Direct Final Rulemaking for Rule 1115 (62 FR 67002, 12/23/1997). The rule amendments are more stringent than the previous rule version. There is no potential that the amendments might cause the release of additional air contaminants or create any adverse environmental impacts.

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On <u>January 22, 2018</u>, on motion by Member <u>ROBERT LEONE</u>, seconded by Member <u>ROBERT LOVINGOOD</u>, and carried, the following resolution is adopted:

WHEREAS, the Mojave Desert Air Quality Management District (MDAQMD) has authority pursuant to California Health and Safety Code (H&S Code) §§40702, 40725-40728 to adopt, amend or repeal rules and regulations; and

WHEREAS, the Federal Clean Air Act (FCAA) requires areas designated non-attainment and classified moderate and above to implement Reasonably Available Control Technology (RACT) for sources subject to Control Techniques Guidelines (CTG) documents issued by United States Environmental Protection Agency (USEPA) and for major sources of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors; and

WHEREAS, the District adopted the 2015 8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis) in February, 2015 which committed to amending Rule 1115 – Metal Parts & Products Coating Operations to current Federal RACT; and

WHEREAS, the MDAQMD has a metal parts and products coating operations rule which was amended April 22, 1996 and approved as RACT into the SIP in 1997 (62 FR 67002, 12/23/1997); and

WHEREAS, this rule is subject to the CTG titled Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings (EPA-453/R-08-003, September 2008), the CTG titled Control of Volatile Organic Emissions From Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products (EPA-450/2-78-015, June 1978), and the CTG titled Control Techniques Guidelines: Industrial Cleaning Solvents (EPA 453/R-06-001, September 2006); and

WHEREAS, there are also two metal coating CTGs titled Control Techniques Guidelines for Large Appliance Coatings (EPA 453/R-07-004, September 2007) and Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, September 2007) for which the District has filed Federal Negative Declarations (February 23, 2015); and

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WHEREAS, the District has several facilities that primarily coat metal parts and products and some additional facilities that coat metal parts and products as part of their operations; and

WHEREAS, there are no facilities that meet the specific applicability threshold of the CTG for Miscellaneous Metal and Plastic Parts, but there are major facilities that coat metal parts and products; and

WHEREAS, the provisions of Health & Safety Code (H&S Code) §39614(d) required the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by the California Air Resources Board (CARB) contained in the *Proposed List of Measures to Reduce Particulate Matter – PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003)*; and

WHEREAS, former H&S Code §39614(d) (expired by its own terms on January 1, 2011) required the adoption of the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by CARB; and

WHEREAS, furthermore, this list required the adoption of Reasonably Available Control Measures (RACM) for PM; and

WHEREAS, the proposed amendments to Rule 1115 address the *RACT SIP Analysis* and former H&S Code §39614(d) commitments; and

WHEREAS, the proposed amendments are necessary to satisfy 42 U.S.C. §§7511a FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to a CTG, and for major sources of ozone precursors and major facilities which coat metal parts and products; and

WHEREAS, the proposed amendments to this rule are also necessary to satisfy the prior commitment to implement the provisions of former H&S Code §39614(d) as adopted in the MDAQMD List and Implementation Schedule for District Measures to Reduce PM pursuant to Health and Safety Code §39614(d); and

WHEREAS, the proposed amendments are clear in that the meaning can be easily understood by the persons impacted by the rule; and

WHEREAS, the proposed amendments to Rule 1115 are in harmony with, and not in conflict with or contradictory to any state law or regulation, federal law or regulation, or court decisions; the proposed rule is consistent with the CTG provisions, and when analyzed, the provisions of Rule 1115

were determined to be readily available, feasible and cost-effective for PM control measures promulgated by CARB; and

WHEREAS, the proposed amendments to Rule 1115 do not impose the same requirements as any existing state or federal law because CTGs and the CARB *Proposed List of Measures to Reduce*

existing state or federal law because CTGs and the CARB *Proposed List of Measures to Reduce*Particulate Matter – PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003) (former H&S Code §39614(d)) are primarily guidance documents and not enforceable in and of themselves, therefore a rule is necessary to implement the applicable provisions of these documents; and

WHEREAS, a public hearing has been properly noticed and conducted, pursuant to H&S Code \$40725, concerning the proposed amendments to Rule 1115; and

WHEREAS, this item was continued to the January 22, 2018 Governing Board meeting to address industry comments; and

WHEREAS, a Notice of Exemption, a Categorical Exemption (Class 8, 14 CCR §15308) for the proposed amendments to Rule 1115, completed in compliance with the California Environmental Quality Act (CEQA), has been presented to the MDAQMD Board; each member having reviewed, considered and approved the information contained therein prior to acting on the proposed amendments to Rule 1115, and the MDAQMD Board having determined that the proposed amendments will not have any potential for resulting in any adverse impact upon the environment; and

WHEREAS, the Governing Board of the MDAQMD has considered the evidence presented at the public hearing; and

NOW, THEREFORE, BE IT RESOLVED, that the Governing Board of the MDAQMD finds that the proposed amendments to Rule 1115 – *Metal Parts & Products Coating Operations* are necessary, authorized, clear, consistent, non-duplicative and properly referenced; and

BE IT FURTHER RESOLVED, that the Governing Board of the MDAQMD hereby makes a finding that the Class 8 Categorical Exemption (14 CCR §15308) applies and certifies the <u>Notice of Exemption</u> for the proposed amendments to Rule 1115; and

BE IT FURTHER RESOLVED, that the Governing Board of the MDAQMD does hereby adopt, pursuant to the authority granted by law, the proposed amendments to Rule 1115, as set forth in the attachments to this resolution and incorporated herein by this reference; and

1	BE IT FURTHER RESOLVED, that this resolution shall take effect immediately upon adoption,
2	that the Executive Office Manager is directed to file the Notice of Exemption in compliance with the
3	provisions of CEQA.
4	PASSED, APPROVED AND ADOPTED by the Governing Board of the Mojave Desert Air Quality
5 6	Management District by the following vote: AYES: 12 MEMBER: CAMARGO, COLE, COX, DECONINCK, HERNANDEZ, LEONE, LOVINGOOD, PEREZ, RAMOS, RIORDAN, SWANSON, WILLIAMS
7 8	NOES: MEMBER:
9	ABSENT: 1 MEMBER: STANTON
10	ABSTAIN: MEMBER:
11	STATE OF CALIFORNIA
12	SS:
13	COUNTY OF SAN BERNARDINO)
14 15	I, Deanna Hernandez, Senior Executive Analyst of the Mojave Desert Air Quality Management
16	District, hereby certify the foregoing to be a full, true and correct copy of the record of the action as the same appears in the Official Minutes of said Governing Board at its meeting of <u>January 22, 2018</u> .
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18	Senior Executive Analyst, Mojave Desert Air Quality Management District.
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AGENDA ITEM #21

DATE: January 22, 2018

RECOMMENDATION: Conduct a continued public hearing to consider the amendment of Rule 1115 - *Metal Parts & Products Coating Operations*: a. Open public hearing; b. Receive staff report; c. Receive public testimony; d. Close public hearing; e. Make a determination that the California Environmental Quality Act (CEQA) Categorical Exemption applies; f. Waive reading of Resolution; g. Adopt Resolution making appropriate findings, certifying the Notice of Exemption, amending Rule 1115 and directing staff actions.

SUMMARY: Rule 1115 is proposed for amendment to satisfy 42 U.S.C. §§7511a (Federal Clean Air Act (FCAA) §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) and for major sources of ozone precursors. Additionally, the District is amending this rule to satisfy a prior commitment to implement the provisions of H&S Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and cost-effective control measures for Particulate Matter from a list of potential local control measures promulgated by the California Air Resources Board (CARB). The amendment of Rule 1115 was continued to address substantive industry comments to clarify rule implementation.

CONFLICT OF INTEREST: None

BACKGROUND: The Federal Clean Air Act (FCAA) requires areas designated non-attainment and classified moderate and above to implement Reasonably Available Control Technology (RACT) for sources subject to Control Techniques Guidelines (CTG) documents issued by United States Environmental Protection Agency (USEPA) for "major sources" of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors. The District adopted the 2015 8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis) in February, 2015 which committed to amending Rule 1115 – Metal Parts & Products Coating Operations to current Federal RACT. The MDAQMD has a metal parts and products coating operations rule which was amended April 22, 1996 and approved as RACT into the SIP in 1997 (62 FR 67002, 12/23/1997). This rule is subject

CUSTODIAN OF RECORDS OF MOJAVE DESERT AIR
QUALITY MANAGEMENT DISTRICT, HEREBY CERTIFY
THE FOREGOING TO BE A FULL, TRUE AND CORRECT
COPY OF THE RECORD OF THE ACTION AS THE SAME
APPEARS IN THE OFFICIAL MINUTES OF SAID
GOVERNING BOARD MEETING

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT.

AGENDA ITEM #21

PAGE 2

to the CTG titled Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings (EPA-453/R-08-003, September 2008), the CTG titled Control of Volatile Organic Emissions From Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products (EPA-450/2-78-015, June 1978), and the CTG titled Control Techniques Guidelines: Industrial Cleaning Solvents (EPA 453/R-06-001, September 2006). There are also two metal coating CTGs titled Control Techniques Guidelines for Large Appliance Coatings (EPA 453/R-07-004, September 2007) and Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, September 2007) for which the District has filed Federal Negative Declarations (February 23, 2015).

The District has several facilities that primarily coat metal parts and products and some additional facilities that coat metal parts and products as part of their operations. There are no facilities that meet the specific applicability threshold of the *CTG for Miscellaneous Metal and Plastic Parts*, but there are major facilities that coat metal parts and products. The MDAQMD is proposing to update Rule 1115 – *Miscellaneous Metal Parts & Products Coating Operations* to reflect current federal RACT.

Additionally the provisions of Health & Safety Code (H&S Code) §39614(d) required the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by CARB. Former H&S Code §39614(d) (expired by its own terms on January 1, 2011) required the adoption of the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by CARB. Furthermore, this list required the adoption of Reasonably Available Control Measures (RACM) for PM. The proposed amendments to Rule 1115 satisfy both of these requirements.

The proposed amendments to Rule 1115 address the *RACT SIP Analysis* and H&S Code §39614(d) commitments. The proposed amendments update rule definitions; transfer efficiency requirements; coating limits; control device efficiency; work practices; VOC content for strippers and surface preparation materials; test methods; and, record retention requirements. A prohibition of sale requirement has been reinserted in the rule as suggested in the August 1997 Technical Support Document for EPA's Notice of Direct Final Rulemaking for Rule 1115 (62 FR 67002, 12/23/1997). The proposed amendments are based on the CTGs, and various other district rules deemed as fulfilling RACT requirements, including but not limited to: South Coast Air Quality Management District Rule 1107 – *Coating of Metal Parts and Products*, amended 01/06/2006 (73 FR 70883, 11/24/2008); Placer County Air Pollution Control District Rule 245 – *Surface Coating of Metal Parts and Products*, amended 08/20/2009 (76 FR 30025, 5/24/2011); and, San Joaquin Valley Unified Air Pollution Control District Rule 4603 – *Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts*, amended 09/17/2009 (76 FR 67369, 11/01/2011).

AGENDA ITEM #21

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A <u>Notice of Exemption</u>, Categorical Exemption (Class8; 14 Cal. Code Reg. §15308) will be prepared by the MDAQMD for the amendment of Rule 1115 pursuant to the requirements of CEQA.

REASON FOR RECOMMENDATION: Health & Safety Code §§40702 and 40703 require the Governing Board to hold a public hearing before adopting rules and regulation. Also, 42 U.S.C. §7410(l) (FCAA §110(l)) requires that all SIP revisions be adopted after public notice and hearing.

REVIEW BY OTHERS: This item was reviewed by Karen Nowak, District Counsel as to legal form and by Alan De Salvio, Deputy Director – Mojave Desert Operations on or about January 8, 2018.

FINANCIAL DATA: No increase in appropriation is anticipated.

PRESENTER: Alan De Salvio, Deputy Director – Mojave Desert Operations

ACTION OF THE GOVERNING BOARD

ADOPTED

Upon Motion by **ROBERT LEONE**, Seconded by **ROBERT LOVINGOOD**, as approved by the following roll call vote:

Ayes:

12

CAMARGO, COLE, COX, DECONINCK, HERNANDEZ, LEONE,

LOVINGOOD, PEREZ, RAMOS, RIORDAN, SWANSON

WILLIAMS

Noes:

Absent:

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STANTON

Abstain: Vacant:

DEANNA HERNANDEZ, SENIOR EXECUTIVE ANALYST

Dated: JANUARY 22, 2018

Ref. Resolution 18-05, "A RESOLUTION OF THE GOVERNING BOARD OF THE MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT MAKING FINDINGS, CERTIFYING THE NOTICE OF EXEMPTION, AMENDING RULE 1115 – METAL PARTS & PRODUCTS COATING OPERATIONS AND DIRECTING STAFF ACTIONS."

AGENDA ITEM #16

DATE: October 23, 2017

RECOMMENDATION: Conduct a public hearing to consider the amendment of Rule 1115 - *Metal Parts & Products Coating Operations* and continue public hearing to January 22, 2018.

SUMMARY: Rule 1115 is proposed for amendment to satisfy 42 U.S.C. §§7511a (Federal Clean Air Act (FCAA) §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) and for major sources of ozone precursors. Additionally, the District is amending this rule to satisfy a prior commitment to implement the provisions of H&S Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and cost-effective control measures for Particulate Matter from a list of potential local control measures promulgated by the California Air Resources Board (CARB). Continuation is requested due to receipt of substantial comment regarding Rule enforcement from industry.

CONFLICT OF INTEREST: None

BACKGROUND: The Federal Clean Air Act (FCAA) requires areas designated non-attainment and classified moderate and above to implement Reasonably Available Control Technology (RACT) for sources subject to Control Techniques Guidelines (CTG) documents issued by United States Environmental Protection Agency (USEPA) for "major sources" of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors. The District adopted the 2015 8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis) in February, 2015 which committed to amending Rule 1115 – Metal Parts & Products Coating Operations to current Federal RACT. The MDAQMD has a metal parts and products coating operations rule which was amended April 22, 1996 and approved as RACT into the SIP in 1997 (62 FR 67002, 12/23/1997). This rule is subject to the CTG titled Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings (EPA-453/R-08-003, September 2008), the CTG titled Control of Volatile

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QUALITY MANAGEMENT DISTRICT, HEREBY CERTIFY
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MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT.

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Organic Emissions From Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products (EPA-450/2-78-015, June 1978), and the CTG titled Control Techniques Guidelines: Industrial Cleaning Solvents (EPA 453/R-06-001, September 2006). There are also two metal coating CTGs titled Control Techniques Guidelines for Large Appliance Coatings (EPA 453/R-07-004, September 2007) and Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, September 2007) for which the District has file Federal Negative Declarations (February 23, 2015).

Additionally the provisions of Health & Safety Code (H&S Code) §39614(d) required the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by CARB. Former H&S Code §39614(d) (expired by its own terms on January 1, 2011) required the adoption of the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by CARB. Furthermore, this list required the adoption of Reasonably Available Control Measures (RACM) for PM. The proposed amendments to Rule 1115 satisfy both of these requirements.

The District has several facilities that primarily coat metal parts and products and some additional facilities that coat metal parts and products as part of their operations. There are no facilities that meet the specific applicability threshold of the *CTG for Miscellaneous Metal and Plastic Parts*, but there are major facilities that coat metal parts and products. The MDAQMD is proposing to update Rule 1115 – *Miscellaneous Metal Parts & Products Coating Operations* to reflect current federal RACT.

The proposed amendments to Rule 1115 address the *RACT SIP Analysis* and H&S Code §39614(d) commitments. The proposed amendments update rule definitions; transfer efficiency requirements; coating limits; control device efficiency; work practices; VOC content for strippers and surface preparation materials; test methods; and, record retention requirements. A prohibition of sale requirement has been reinserted in the rule as suggested in the August 1997 Technical Support Document for EPA's Notice of Direct Final Rulemaking for Rule 1115 (62 FR 67002, 12/23/1997). The proposed amendments are based on the CTGs, and various other district rules deemed as fulfilling RACT requirements, including but not limited to: South Coast Air Quality Management District Rule 1107 – *Coating of Metal Parts and Products*, amended 01/06/2006 (73 FR 70883, 11/24/2008); Placer County Air Pollution Control District Rule 245 – *Surface Coating of Metal Parts and Products*, amended 08/20/2009 (76 FR 30025, 5/24/2011); and, San Joaquin Valley Unified Air Pollution Control District Rule 4603 – *Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts*, amended 09/17/2009 (76 FR 67369, 11/01/2011).

AGENDA ITEM #16

PAGE 3

A <u>Notice of Exemption</u>, Categorical Exemption (Class8; 14 Cal. Code Reg. §15308) will be prepared by the MDAQMD for the amendment of Rule 1115 pursuant to the requirements of CEQA.

REASON FOR RECOMMENDATION: Health & Safety Code §§40702 and 40703 require the Governing Board to hold a public hearing before adopting rules and regulation. Also, 42 U.S.C. §7410(l) (FCAA §110(l)) requires that all SIP revisions be adopted after public notice and hearing.

REVIEW BY OTHERS: This item was reviewed by Karen Nowak, District Counsel as to legal form and by Alan De Salvio, Deputy Director – Mojave Desert Operations on or about October 9, 2017.

FINANCIAL DATA: No increase in appropriation is anticipated.

PRESENTER: Alan De Salvio, Deputy Director – Mojave Desert Operations

CONCENSUS ACTION OF THE GOVERNING BOARD

OPEN PUBLIC HEARING AND

CONTINUED PUBLIC HEARING TO GOVERNING BOARD MEETING OF

JANUARY 22, 2018.

AGENDA ITEM #11

DATE: September 25, 2017

RECOMMENDATION: Set date of October 23, 2017 to conduct a public hearing to consider the amendment of Rule 1115 – *Metal Parts & Products Coating Operations* and approval of California Environmental Quality Act (CEQA) documentation.

SUMMARY: This item officially sets the date for the mandatory public hearing to be held on the amendment of Rule 1115. Rule 1115 is proposed for amendment to satisfy 42 U.S.C. §§7511a (Federal Clean Air Act (FCAA) §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) and for major sources of ozone precursors.

CONFLICT OF INTEREST: None

BACKGROUND: The FCAA requires areas designated non-attainment and classified moderate and above to implement RACT for sources subject to CTG documents issued by United States Environmental Protection Agency (USEPA) for "major sources" of volatile organic compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors. The District adopted the 2015 8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis) in February, 2015 which committed to amending Rule 1115 – Metal Parts & Products Coating Operations to current Federal RACT. The MDAQMD has a metal parts and products coating operations rule which was amended April 22, 1996 and approved as RACT into the SIP in 1997 (62 FR 67002, 12/23/1997). This rule is subject to the CTG titled Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings (EPA-453/R-08-003, September 2008), the CTG titled Control of Volatile Organic Emissions From Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products (EPA-450/2-78-015, June 1978), and the CTG titled Control Techniques Guidelines: Industrial Cleaning Solvents (EPA 453/R-06-001, September 2006). There are also two metal coating CTGs titled Control Techniques Guidelines for Large Appliance Coatings (EPA 453/R-07-004, September 2007) and Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, September 2007) for which the District has filed Federal Negative Declarations (February 23, 2015).

CUSTODIAN OF RECORDS OF MOJAVE DESERT AIR
QUALITY MANAGEMENT DISTRICT, HEREBY CERTIFY
THE FOREGOING TO BE A FULL, TRUE AND CORRECT
COPY OF THE RECORD OF THE ACTION AS THE SAME
APPEARS IN THE OFFICIAL MINUTES OF SAID
GOVERNING BOARD MEETING

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT.

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The District has several facilities that primarily coat metal parts and products, and additional facilities that coat metal parts and products as part of their operations. There are no facilities that meet the specific applicability threshold of the *CTG for Miscellaneous Metal and Plastic Parts*, but there are major facilities that coat metal parts and products. The MDAQMD is now proposing to update Rule 1115 – *Metal Parts & Products Coating Operations* to reflect current federal RACT.

The proposed amendments to Rule 1115 address the *RACT SIP Analysis* commitments. The proposed amendments update rule definitions, transfer efficiency requirements, coating limits, control device efficiency, work practices, VOC content for strippers and surface preparation materials, test methods, and record retention requirements. A requirement for prohibition of sale has been reinserted in the rule as suggested in the August 1997 Technical Support Document for EPA's Notice of Direct Final Rulemaking for Rule 1115 (62 FR 67002, 12/23/1997). The proposed amendments are based on the CTGs, and various district rules deemed as fulfilling RACT requirements, including but not limited to: South Coast Air Quality Management District Rule 1107 – *Coating of Metal Parts and Products*, amended 01/06/2006 (73 FR 70883, 11/24/2008); Placer County Air Pollution Control District Rule 245 – *Surface Coating of Metal Parts and Products*, amended 08/20/2009 (76 FR 30025, 5/24/2011); and, San Joaquin Valley Unified Air Pollution Control District Rule 4603 – *Surface Coating of Metal Parts and Products*, *Plastic Parts and Products*, and *Pleasure Crafts*, amended 09/17/2009 (76 FR 67369, 11/01/2011).

A <u>Notice of Exemption</u>, Categorical Exemption (Class 8; 14 Cal. Code Reg. §15308) will be prepared by the MDAQMD for the amendment of Rule 1115 pursuant to the requirements of CEQA.

REASON FOR RECOMMENDATION: Health & Safety Code §§40702 and 40703 require the Governing Board to hold a public hearing before adopting rules and regulation. Also, 42 U.S.C. §7410(l) (FCAA §110(l)) requires that all SIP revisions be adopted after public notice and hearing.

REVIEW BY OTHERS: This item was reviewed by Karen Nowak, District Counsel as to legal form and by Alan De Salvio, Deputy Director – Mojave Desert Operations on or before September 11, 2017.

FINANCIAL DATA: No increase in appropriation is anticipated.

PRESENTER: Alan De Salvio, Deputy Director – Mojave Desert Operations

ACTION OF THE GOVERNING BOARD

MINUTES OF THE GOVERNING BOARD OF THE MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT VICTORVILLE, CALIFORNIA

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APPROVED (SET DATE)

Upon Motion	by BA	RB STANTON, Seconded by JOHN COLE, as approved by the following
roll call vote:		
Ayes:	10	CAMARGO, COLE, COX, DECONINCK, HERNANDEZ,

LEONE, LOVINGOOD, RIORDAN, STANTON, WILLIAMS

Noes:

3

PEREZ, RAMOS, RUSS

Absent: Abstain: Vacant:

DEANNA HERNANDEZ, EXECUTIVE OFFICE MANAGER
BY

Dated: SEPTEMBER 25, 2017

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT GOVERNING BOARD

****NOTICE OF <u>CANCELLATION</u> OF REGULAR MEETING****

OF NOVEMBER 27, 2017 & DECEMBER 25, 2017

NOTICE IS HEREBY GIVEN that the Regular Meeting of the Governing Board of the Mojave Desert Air Quality Management District (District) scheduled for Monday, November 27, 2017 at 10:00 a.m. and Monday, December 25, 2017 has been cancelled.

NOTICE IS ALSO HEREBY GIVEN that the date of the next regular meeting of the Governing Board is scheduled for Monday, January 22, 2018 at 10:00 a.m.

SAID MEETING will be conducted in the Mojave Desert Air Quality Management District Board Chambers, 14306 Park Avenue, Victorville, CA 92392-2310. Interested persons may attend and submit oral and/or written comments/statements at the meeting. It is requested that written comments/statements be submitted to the Victorville location prior to the meeting.

A copy of the Agenda will be duly posted in the main lobby of the District's Headquarter located at 14306 Park Avenue, Victorville, CA for viewing.

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT GOVERNING BOARD

DEANNA HERNANDEZ EXECUTIVE OFFICE MANAGER PHONE: (760) 245-1661 EXT. 6244

MAILED AND POSTED: Thursday, November 9, 2017

DATE

RULE 1115 Metal Parts & Products Coating Operations

(A) General

- (1) Purpose
 - (a) The purpose of this Rule is to limit the emission of Volatile Organic Compounds from the coating of Metal Parts and Products.
- (2) Applicability
 - (a) This Rule shall apply to all metal coating operations, except those performed on Aircraft or Aerospace Vehicles; Magnet Wire; Metal Containers, Closures and Coils; marine vessel exteriors; Motor Vehicles; Motor Vehicle Assembly Lines; Mobile Equipment; or those operations subject to the coating provisions of any other source-specific rule of the District.
 - (b) Any Coating, coating operation or Facility which is exempt from all or a portion of the VOC limits of this Rule shall comply with the provisions of Rule 442.

(B) Definitions

The definitions contained in District Rule 102 – *Definition of Terms* shall apply unless the term is otherwise defined herein:

- (1) "Adhesive" Any substance that is used to bond surfaces together by adhesion.
- (2) "Aerosol Coating Product" A pressurized Coating product containing pigments or resins that dispenses product ingredients by means of a propellant, and is packaged in a disposable can for hand-held application, or for use in specialized Equipment for ground traffic/marking applications.
- (3) "<u>Aircraft or Aerospace Vehicle</u>" Any fabricated part, assembly of parts or completed unit of any aircraft, helicopter, missile or space vehicle.
- (4) "<u>Assembly Line</u>" An arrangement of industrial Equipment and workers in which the product passes from one specialized operation to another until complete, either by automatic or manual means.
- (5) "<u>Camouflage Coating</u>" A Coating used, principally by the military, to conceal Equipment from detection.
- (6) "Chemical Agent Resistant Coating" (CARC) A Coating applied to military tactical Equipment in order to protect the Equipment from chemical warfare agents.

- (7) "Clear Coating" A Coating that either lacks color and opacity, or is transparent, and uses the surface to which it is applied as a reflective base or undertone color.
- (8) "Closure" Any component which is used to close or seal a filled can, jar or bottle.
- (9) "Coil" Any flat metal sheet or strip that is rolled or wound in concentric rings.
- (10) "<u>Combined Efficiency</u>" The capture efficiency multiplied by the Control Equipment efficiency, expressed as an overall weight percent.
- (11) "<u>Contract Painter</u>" A non-manufacturer of Metal Parts and Products who applies Coatings to such products at his Facility exclusively under contract with one or more parties that operate under separate ownership and control.
- (12) "<u>Drum</u>" Any cylindrical metal shipping container of 13 to 110 gallon capacity.
- (13) "Electric-Insulating and Thermal-Conducting Coating" A Coating that displays an electrical insulation of at least 1000 volts DC per mil on a flat test plate and an average thermal conductivity of at least 0.27 BTU per hour-foot-degree-Fahrenheit.
- (14) "<u>Electric-Insulating Varnish</u>" A non-convertible-type Coating applied to electrical motors, components of electrical motors, or power transformers, to provide electrical, mechanical, and environmental protection or resistance.
- (15) "<u>Electrocoating (Electrodeposition)</u>" A process that uses Coating concentrates or pastes added to a water bath. The Coating is applied using either an electric current in either an anodic or cathodic bath.
- (16) "<u>Electrostatic Spray</u>" A Coating application method accomplished by charging atomized paint particles for deposition by electrostatic attraction on a metal part or product.
- (17) "<u>Etching Filler</u>" A Coating that contains less than 23 percent solids by weight and at least 1/2 percent acid by weight, and is used instead of applying a pretreatment Coating followed by a primer.
- (18) "Extreme High-Gloss Coating" A Coating which, when tested by the American Society for Testing Material (ASTM) Method D-523-1980, shows a reflectance of 75 percent or more on a 60° meter.
- (19) "<u>Extreme-Performance Coating</u>" A Coating used on a metal surface where the coated surface is, in its intended use, exposed to any of the following:
 - (a) Repeated heavy abrasion, including mechanical wear and repeated scrubbing with industrial-grade Solvents, detergents, cleaners, or abrasive scouring agents;

- (b) Frequent or chronic exposure to salt water, corrosives, caustics, acids, oxidizing agents, chemicals, chemical fumes, chemical mixtures or solutions;
- (c) Repeated exposure to temperatures in excess of 250 °F.

Extreme performance Coatings include, but are not limited to, Coatings applied to locomotives, railroad cars, farm machinery, and heavy duty trucks.

- (20) "<u>Hand Application Methods</u>" The application of Coatings by manually held, non-mechanically operated Equipment. Such Equipment includes paint brushes, hand rollers, caulking guns, trowels, spatulas, syringe daubers, rags and sponges.
- (21) "Heat-Resistant Coating" A Coating that must withstand a temperature of at least 400 °F (204°C) during normal use.
- (22) "<u>High-Gloss Coating</u>" A Coating which, when tested in accordance with ASTM Method D-523-89, shows a reflectance of 85 percent or more on a 60° meter.
- (23) "High-Performance Architectural Coating" A Coating used to protect architectural subsections and which meets the requirements of the Architectural Aluminum Manufacturer Association's publication number AAMA 2604-05 (Voluntary Specification, Performance Requirements and Test Procedures for High Performance Organic Coatings on Aluminum Extrusions and Panels) or 2605-05 (Voluntary Specification, Performance Requirements and Test Procedures for Superior Performing Organic Coatings on Aluminum Extrusions and Panels).
- (24) "<u>High-Temperature Coating</u>" A Coating that is certified to withstand a temperature of 1000 °F for 24 hours.
- (25) "Ink" A fluid that contains dyes and/or colorants and is used to make markings but not to protect surfaces.
- (26) "<u>Magnetic Data Storage Disk Coating</u>" A Coating used on a metal disk which stores data magnetically.
- (27) "<u>Magnet Wire</u>" Wire used in electro-magnetic field application in electrical Equipment, such as transformers, motors, generators, and magnetic tape recorders.
- (28) "Metal Container, Closure and Coil Coating Operations" The application of any VOC-containing Coating to the surfaces of metal cans, Drums, Pails, lids, Closures, or to the surface of flat metal sheets, strips, rolls, or Coils during the manufacturing and/or reconditioning process.
- (29) "<u>Metallic Coating</u>" A Coating which contains more than five (5) grams of metal particles per liter of Coating, as applied. Metal Particles are pieces of a pure elemental metal or a combination of elemental metals.

- (30) "Metal Parts and Products" Any components or complete units fabricated from metal, excluding Aircraft or Aerospace Vehicles, Magnet Wire, Metal Containers, Closures and Coils, marine vessel exteriors, Motor Vehicles, Motor Vehicle Assembly Lines, Mobile Equipment or those subject to the coating provisions of any other source-specific rule of the District.
- (31) "<u>Military Specification Coating</u>" A Coating applied to Metal Parts and Products and which has a paint formulation approved by a United States Military Agency for use on military Equipment.
- (32) "Mobile Equipment" Any Equipment which may be drawn or is capable of being driven on a roadway, including, but not limited to, truck bodies, truck trailers, camper shells, mobile cranes, bulldozers, street cleaners, golf carts and implements of husbandry.
- (33) "Mold-Seal Coating" The initial Coating applied to a new mold or repaired mold to provide a smooth surface which, when coated with a mold release Coating, prevents products from sticking to the mold.
- (34) "Motor Vehicle Rework" The reconditioning of Motor Vehicles.
- (35) "<u>Multi-Component Coating</u>" A Coating requiring the addition of a separate reactive resin, commonly known as a catalyst or hardener, before application to form an acceptable dry film.
- (36) "One-Component Coating" A Coating that is ready for application as it comes out of its container to form an acceptable dry film. A thinner, necessary to reduce the viscosity, is not considered a component.
- (37) "Pail" Any cylindrical metal shipping container of at least 1 but less than 13 gallon capacity and constructed of 29 gauge or heavier material.
- (38) "Pan-backing Coating" A Coating applied to the surface of pots, pans, or other cooking implements that are exposed directly to a flame or other heating elements.
- (39) "Performance Test" A test conducted primarily for the purpose of researching and developing new processes and products, that is conducted under the close supervision of technically trained personnel, and that is not involved in the manufacture of final or intermediate products for commercial purposes, except in a de minimis manner.
- (40) "Prefabricated Architectural Component Coatings" Coatings applied to Metal Parts and Products which are to be used as an architectural structure.
- (41) "<u>Pretreatment Wash Primer</u>" Any Coating which contains no more than 12 percent solids by weight, and a minimum of 0.5 percent acid by weight, is necessary to provide surface etching and is applied directly to bare metal surfaces to provide corrosion resistance and adhesion, and ease of Stripping.

- (42) "<u>Repair Coating</u>" A Coating used to recoat portions of a product which has sustained mechanical damage to the original Coating following normal painting operations.
- (43) "Safety-Indicating Coating" A Coating which changes physical characteristics, such as color, to indicate unsafe conditions.
- (44) "<u>Silicone-Release Coating</u>" Any Coating which contains silicone resin and is intended to prevent food from sticking to metal surfaces such as baking pans.
- (45) "<u>Solar-Absorbent Coating</u>" A Coating which has as its primary purpose the absorption of solar radiation.
- (46) "Solid-Film Lubricant" Any very thin Coating consisting of a binder system, containing primarily one or more of molybdenum disulfide, graphite, polytetrafluoroethylene (PTFE) or other solids which act as dry lubricants between faying surfaces.
- (47) "<u>Stencil Coating</u>" An Ink or a pigmented Coating which is rolled or brushed onto a template or stamp for the purpose of adding identifying letters, numbers and/or other markings to Metal Parts and Products.
- (48) "<u>Stripper</u>" A material applied to the surface of any metal part of product to completely remove maskants, Coatings or Coating residues. A Stripper is not a surface preparation material or cleanup material. Material used for removal of overspray is not a Stripper.
- (49) "<u>Surface Preparation</u>" The removal of contaminants, including dust, oil and grease, prior to Coating applications.
- (50) "<u>Textured Finish</u>" Any rough surface produced by spraying large drops of Coating onto a previously coated surface.
- (51) "<u>Theoretical Potential Emissions</u>" The maximum capacity of a stationary source to emit a regulated air pollutant, based on the greater of design capacity or maximum production (based on 8760 hours/year), before add on controls.
- (52) "<u>Touch-Up Coating</u>" A Coating applied by brush or hand-held, non-refillable aerosol cans to repair minor surface damage and imperfections after the main coating operation.
- (53) "<u>Vacuum-Metalizing Coating</u>" The undercoat applied to the substrate on which the metal is deposited or the overcoat applied directly to the metal film.

(C) Requirements

(1) Transfer Efficiency

- (a) A Person shall not apply any Coatings to Metal Parts and Products subject to the provisions of this Rule, unless the Coating is applied with Equipment properly operated according to manufacturer's suggested guidelines, and using one of the following application methods:
 - (i) Electrostatic Spray;
 - (ii) High Volume Low Pressure (HVLP) Spray Equipment;
 - (iii) Dip coat (including electrodeposition);
 - (iv) Flow coat;
 - (v) Roller Coat;
 - (vi) Airless spray;
 - (vii) Air-assisted airless spray;
 - (viii) Hand Application Methods;
 - (ix) Other coating application methods as are demonstrated to have a Transfer Efficiency at least equal to or better than achieved by HVLP spraying; or
 - (x) Equipment as approved by the APCO, CARB and USEPA, provided that the Owner/Operator submits an application and demonstrates that the use of HVLP spray Equipment would result in greater emissions than the proposed system Equipment. The approval shall be limited to only those Coatings listed in the application plan.

(2) VOC Content of Coatings

(a) A Person shall not apply any Coating to Metal Parts and Products, including any VOC-containing materials added to the original Coating supplied by the manufacturer, which contains VOC in excess of the limits specified in subsection (C)(2)(a)(i) below:

(i) COATING LIMITS

(Grams of VOC Per Liter of Coating, Less Water and Less Exempt Compounds)

Coating Category	Air-Dried		Baked	
	g/L	lb/gal	g/L	lb/gal
General One-Component*	340	(2.8)	275	(2.3)
General Multi-Component*	340	(2.8)	275	(2.3)
Military Specification	340	(2.8)	275	(2.3)
Etching Filler	420	(3.5)	420	(3.5)
Solar-Absorbent	420	(3.5)	360	3.0)
Heat-Resistant	420	(3.5)	360	(3.0)
High-Gloss	420	(3.5)	360	(3.0)
Extreme High-Gloss	420	(3.5)	360	(3.0)

Coating Category	Air-Dried		Baked	
	g/L	lb/gal	g/L	lb/gal
Metallic	420	(3.5)	420	(3.5)
Extreme-Performance	420	(3.5)	360	(3.0)
Prefabricated Architectural One- Component	420	(3.5)	275	(2.3)
Prefabricated Architectural Multi- Component	420	(3.5)	275	(2.3)
Touch-Up	420	(3.5)	360	(3.0)
Repair	420	(3.5)	360	(3.0)
Silicone-Release	420	(3.5)	420	(3.5)
High-Performance Architectural	420	(3.5)	420	(3.5)
Camouflage	420	(3.5)	420	(3.5)
Vacuum-Metalizing	420	(3.5)	420	(3.5)
Mold-Seal	420	(3.5)	420	(3.5)
High-Temperature	420	(3.5)	420	(3.5)
Electric-Insulating Varnish	420	(3.5)	420	(3.5)
Pan-Backing	420	(3.5)	420	(3.5)
Pretreatment Wash Primer	420	(3.5)	420	(3.5)
Clear	520	(4.3)	520	(4.3)
Drum (New, Exterior)	340	(2.8)	340	(2.8)
Drum (New, Interior)	420	(3.5)	420	(3.5)
Drum (Reconditioned, Exterior)	420	(3.5)	420	(3.5)
Drum (Reconditioned, Interior)	500	(4.2)	500	(4.2)
Chemical Agent Resistant	420	(3.5)	420	(3.5)

^{*}A General Coating is a Coating that does not meet a specific Coating category definition and is assumed to be a general use Coating and subject to the VOC limit for a General Coating.

(3) Sell-Through and Use of Coatings

(a) The provisions of subsection (C)(2)(a)(i) above shall not apply to the General or Military Specification Coating Category limits until (one year from rule amendment). Until (one year from rule amendment), the following limits shall apply:

Category	Air-Dried		Baked	
	g/L	lb/gal	g/L	lb/gal
General (One- or Multi- Component)	420	(3.5)	360	(3.0)
Military Specification	420	(3.5)	360	(3.0)

- (4) Add-On Control Alternative
 - (a) In lieu of complying with the VOC content limitations in subsection (C)(2) and (C)(3) above, air pollution Control Equipment with a capture and control system Combined Efficiency of at least 90%, as determined pursuant to subsections (G)(2)(g) and (G)(2)(h) of this Rule, may be used.
- (5) Strippers, Surface Preparation and Cleanup Solvent
 - (a) The requirements of this Section shall apply to any Person using Solvent for Surface Preparation, cleanup, stripping, and paint removal, including paint spray Equipment.
 - (b) A Person shall not use VOC-containing materials for the cleanup of application Equipment used in coating operations, unless;
 - (i) Application Equipment cleaning Equipment requirements:
 - a. The application Equipment is disassembled and cleaned in an enclosed system during the washing, rinsing and draining processes; or
 - b. The application Equipment or Equipment parts are cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning material is being added, provided the cleaned Equipment or Equipment parts are drained to the container until dripping ceases; or
 - c. Other application Equipment cleaning methods that are demonstrated to be as effective as the Equipment described above in minimizing emissions of VOC to the atmosphere are used, provided that the device has been approved in writing prior to use by the APCO, CARB and USEPA.
 - (ii) Closed containers or pipes to store and convey VOC-containing cleaning and cleaning waste materials are used;
 - (iii) Spills of VOC-containing cleaning and cleaning waste materials are minimized:
 - (iv) VOC emissions are minimized during cleaning operations.
 - (c) A Person shall not use VOC-containing materials for Surface Preparation and cleanup unless:
 - (i) The material contains 25 grams or less of VOC per liter of material (0.21 pounds per gallon); or
 - (ii) The material has an initial boiling point of 190 °C (374°F) or greater; or
 - (iii) The material has a total VOC vapor pressure of 8 mm Hg or less, at $20 \, ^{\circ}\text{C}$ (68 $^{\circ}\text{F}$).

- (d) A Person shall not use a Stripper on miscellaneous metal parts and products unless:
 - (i) The material contains 200 grams or less of VOC per liter of material (1.7 pounds per gallon).
- (e) A Person shall use closed, nonabsorbent containers for the storage or disposal of cloth, paper, or any other absorbent material used for Solvent Surface Preparation and cleanup.

(6) Prohibition of Specifications

(a) A Person shall not specify the use in the District of any Coating to be applied to any metal parts and products subject to the provisions of this Rule that does not meet the limits and requirements of this Rule.

(7) Prohibition of Sale

(a) A Person shall not offer for sale or sell within the District any Coating, if such product is prohibited by any provisions of this Rule. The prohibition of this section shall apply to the sale of any Coating which will be applied at any physical location within the District.

(8) Compliance Statement Requirement

(a) The manufacturer of Coatings subject to this Rule shall provide on Coating containers or on separate data sheets the designation of VOC content as supplied, including Coating constituents. The VOC content shall be expressed in grams per liter or pounds per gallon, excluding water and exempt Solvents.

(9) Compliance Assurance Monitoring

- (a) Any coating operation subject to subsection (C)(4) shall utilize Compliance Assurance Monitoring, as approved by the APCO, for any add-on Control Equipment used to meet the control requirement.
- (b) Records of the monitoring device(s), mechanisms and/or techniques, and other data necessary to demonstrate compliance with the control requirements, shall be maintained and produced upon request of the APCO, pursuant to Section (F).
- (c) Compliance with the add-on control requirements stipulated in subsection (C)(4) shall be determined by source testing and/or evaluating Compliance Assurance Monitoring data.
- (d) Each monitoring device(s), mechanism and/or technique shall be calibrated/maintained in a manner approved by the APCO.

(D) Exemptions

- (1) The provisions of this Rule shall not apply to Aerosol Coating Products.
- (2) The provisions of subsection (C)(2), (C)(3) and (C)(4) of this Rule shall not apply to any Facility that does not exceed 10 tons per year Theoretical Potential Emissions of VOC, as defined in subsection (B)(51), subject to the following conditions:
 - (a) Any Person claiming exemption under this paragraph shall meet the certification requirements specified in subsection (E)(1) and the recordkeeping requirements specified in Section (F); and
 - (b) Any Facility operating under this exemption whose emissions exceed 10 tons on an annual basis shall henceforth be subject to subsections (C)(2), (C)(3) and (C)(4) of this Rule.
- (3) The provisions of subsections (C)(1), (C)(2), (C)(3) and (C)(4) of this Rule shall not apply to:
 - (a) Any Facility which has a daily usage of less than one (1) gallon of Coating, including any VOC-containing materials added to the original Coating as supplied by the manufacturer, subject to this Rule;
 - (b) Total noncompliant Coating use per Facility that does not exceed 55 gallons per year;
 - (c) Stencil Coatings;
 - (d) Safety-indicating Coatings;
 - (e) Magnetic Data Storage Disk Coatings;
 - (f) Solid-film Lubricants;
 - (g) Adhesives;
 - (h) The coating of Motor Vehicle bodies at Motor Vehicle Rework facilities;
 - (i) Electric-insulating and thermal conducting Coatings.
- (4) The provisions of subsection (C)(1) of this Rule shall not apply to Contract Painters while applying Coatings to objects on trays, provided no object has any dimension greater than 12 inches.
- (5) The provisions of subsection (C)(1) of this Rule shall not apply to the application of Touch-up Coatings, Repair Coatings, Textured Coatings, Metallic Coatings which have a metallic content of more than 30 grams per liter, Mold-seal Coatings, or to facilities that use less than three (3) gallons of such Coatings per

- day, as applied, including any VOC-containing materials added to the original Coatings as supplied by the manufacturer.
- (6) The provisions of subsections (C)(1), (C)(2), (C)(3), (C)(4) and (C)(5) of this Rule shall not apply to the application of Coatings and use of cleaning Solvents while conducting Performance Tests on the Coatings at paint manufacturing facilities.
- (7) The provisions of subsection (C)(1)(a)(ix) shall not apply to metal Coatings with a viscosity of 650 centipoise or greater, as applied, so long as (C)(1)(a)(x) is complied with.

(E) Administrative Requirements

- (1) Certification Requirements for Facilities with Theoretical Potential Emissions of 10 Tons VOC or Less per Year:
 - (a) Any Person claiming an exemption under subsection (D)(2) of this Rule shall certify the exemption on an annual basis, by:
 - (i) Submitting a written certification to the APCO certifying that the affected Facility shall not emit VOCs in excess of 10 tons annually. At a minimum, the certification shall include the following information:
 - a. A summary of past annual usage of VOC-containing materials and related emissions; and
 - b. The Facility's Theoretical Potential Emissions of VOC, as defined in subsection (B)(51).

(F) Monitoring and Records

- (1) Coating Records
 - (a) Any Facility or Person claiming exemption pursuant to subsections (D)(2), (D)(3)(a), (D)(3)(b) or (D)(5) shall meet the recordkeeping requirements of this Rule so as to be able to certify the exemption status.
 - (b) Any Person subject to subsections (C)(1), (C)(2), (C)(3), (C)(4), (C)(5) or (F)(1)(a) shall comply with the following requirements:
 - (i) The Person shall maintain and produce a current list of Coatings in use which provides all of the Coating data necessary to evaluate compliance, including, but not limited to, the following information, as applicable:
 - a. Coating, catalyst, and reducer used.
 - b. mix ratio of components used.
 - c. VOC content of Coating as applied.

- (ii) The Person shall maintain and produce records on a daily basis, by permit unit, including:
 - a. Coating and mix ratio of components used in the Coating; and
 - b. quantity of each Coating applied.
- (iii) The Person shall maintain and produce records on a daily basis showing the type and amount of Solvent used for cleanup, Surface Preparation, or paint removal.
- (c) Any Facility or Person claiming an exemption pursuant to subsection (D)(2) of this Rule shall maintain and produce records of purchase orders and invoices of VOC-containing materials which specify the name of the materials in use. The requirements of this paragraph shall be in addition to all other applicable recordkeeping requirements specified in this Section.

(2) Add-on Control Equipment Records

- (a) Any Person using emission Control Equipment, pursuant to subsection (C)(4), shall maintain and produce daily records of key system operating parameters and maintenance procedures which will demonstrate continuous operation and compliance of the emissions Control Equipment during periods of emissions-producing activities. Key system operating parameters are those necessary to ensure compliance with VOC content of Coating requirements, such as temperatures, pressures and flow rates.
- (3) All records for the previous five (5) year period maintained and produced pursuant to this Section shall be retained and available for inspection by the APCO upon request.

(G) Test Methods

- (1) A violation of the limits contained in this Rule, as determined by any one of the test methods listed below, shall constitute a violation of this Rule.
- (2) The following specified test methods shall be used to determine compliance with the provisions of this Rule:
 - (a) The VOC content of Coatings and Solvents, as specified in subsections (C)(2), (C)(3), (C)(5)(c)(i) and (C)(5)(d)(i), shall be analyzed as prescribed by USEPA Reference Method 24 Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings for VOC content (without correction for exempt compounds) and ASTM D4457-85 Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph, or CARB Method 432 Determination of Dichloromethane and 1,1,1 Trichloroethane in Paints and Coatings (09/12/1989), for determination of emissions of exempt compounds. Perfluorocarbon compounds shall be assumed to be absent from a product or process unless a manufacturer or Facility Operator

- identifies the specific individual compounds (from the broad classes of perfluorocarbon compounds) and the amounts present in the product or process and provides a validated test method which can be used to quantify the specific compounds.
- (b) Determination of the initial boiling point of liquid containing VOC, subject to subsection (C)(5)(c)(ii), shall be conducted in accordance with ASTM D1078-86 Test Method for Distillation Range of Volatile Organic Liquids.
- (c) Calculation of total VOC vapor pressure for materials subject to subsection (C)(5)(c)(iii) shall be conducted in accordance with ASTM D2879-97 Test Method for Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope. The fraction of water and Exempt Compounds in the liquid phase shall be determined by using ASTM D3792-91 Test Method for Water Content of Water-Reducible Paints by Direct Injection into a Gas Chromatograph and D4457-85 Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph and shall be used to calculate the partial pressure of water and Exempt Compounds. The results of vapor pressure measurements obtained using ASTM D2879-97 shall be corrected for partial pressure of water and Exempt Compounds.
- (d) Measurement of Solvent losses from alternative application cleaning Equipment subject to (C)(5)(b)(i)c shall be conducted in accordance with the South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" (10/03/1989).
- (e) Measurement of acid content of a substance shall be determined by ASTM D1613-85.
- (f) Measurement of metal content of Coatings shall be determined in accordance with South Coast Air Quality Management District's "Laboratory Methods of Analysis for Enforcement Samples" manual, Method 311-91 Analysis of Percent Metal in Metallic Coatings by Spectrographic Method, (06/01/1991).
- (g) Capture Efficiency shall be determined according to USEPA's technical document, *Revised Capture Efficiency Guidance for Control of Volatile Organic Compound Emissions* (February 7, 1995).
- (h) The control efficiency of the Control Equipment shall be determined according to USEPA Test Methods 25 Determination of Total Gaseous Nonmethane Organic Emissions as Carbon, 25A Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer or 25B Determination of Total Gaseous Organic Concentration Using a Nondispersive Infrared Analyzer for measuring the total gaseous organic

concentrations at the inlet and outlet of the emissions Control Equipment, as contained in 40 CFR Part 60, Appendix A. USEPA Test Method 18 or CARB Method 422 - Determination of Volatile Organic Compounds in Emissions from Stationary Sources (Exempt VOCs) shall be used to determine emissions of Exempt Compounds.

- (i) Measurement of solids content by weight of a substance shall be conducted in accordance with ASTM D1475-90 Test Method for Density of Paint, Varnish Lacquer, and Related Products.
- (j) Measurement of viscosity shall be conducted in accordance with ASTM D1200-14 Standard Test Method for Viscosity by Ford Viscosity Cup.
- (k) Alternative test methods may be used upon obtaining the approval of the APCO, CARB and USEPA.
- (3) The following calculations shall be used to determine compliance with the provisions of this Rule:
 - (a) Grams of VOC Per Liter of Coating Less Water and Less Exempt Compounds (VOC Content):

$$G_{v} = \frac{W_{s} - W_{w} - W_{es}}{V_{m} - V_{w} - V_{es}}$$

Where:

 $G_v = Grams of VOC Per Liter of Coating Less Water and Less$

Exempt Compounds

W_s = Weight of volatile compounds in grams

 $W_w = Weight of water in grams$

 W_{es} = Weight of Exempt Compounds in grams

 $V_{\rm m}$ = Volume of material in liters

 $V_{\rm w}$ = Volume of water in liters

V_{es} = Volume of Exempt Compounds in liters

(b) Grams of VOC Per Liter of Material:

Where:

$$G_{v} = \frac{W_{s} - W_{w} - W_{es}}{V_{m}}$$

Where:

G_v = Grams of VOC Per Liter of Coating Less Water and Less

Exempt Compounds

W_s = Weight of volatile compounds in grams

W_w = Weight of water in grams

W_{es} = Weight of Exempt Compounds in grams

 V_m = Volume of material in liters

(4) The following test method is required for use in determining Transfer Efficiency of alternative application methods:

(a) Demonstration of Transfer Efficiency of alternative application methods subject to subsection (C)(1)(a)(x) shall be conducted in accordance with South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User" (5/24/89).

See SIP Table at http://www.mdaqmd.ca.gov

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Mojave Desert Air Quality Management District

Staff Report Amendments to Rule 1115 – Metal Parts & Products Coating Operations

Amended on January 22, 2018

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List of Acronyms

BACT Best Available Control Technology

BARCT Best Available Retrofit Control Technology

CARB California Air Resources Board

CCAA California Clean Air Act

CEQA California Environmental Quality Act

CTG Control Techniques Guidelines

FCAA Federal Clean Air Act

H&S Code California Health & Safety Code

MDAB Mojave Desert Air Basin

MDAQMD Mojave Desert Air Quality Management District

NOx Oxides of Nitrogen PM Particulate Matter

RACM Reasonably Available Control Measures
RACT Reasonably Available Control Technology
SCAQMD South Coast Air Quality Management District

SIP State Implementation Plan

SOx Oxides of Sulfur

TAC Technical Advisory Committee

USEPA United States Environmental Protection Agency

VOC Volatile Organic Compounds

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STAFF REPORT

Rule 1115 – Metal Parts & Products Coating Operations

I. PURPOSE OF STAFF REPORT

A staff report serves several discrete purposes. Its primary purpose is to provide a summary and background material to the members of the Governing Board. This allows the members of the Governing Board to be fully informed before making any required decision. It also provides the documentation necessary for the Governing Board to make any findings, which are required by law to be made prior to the approval or adoption of a document. In addition, a staff report ensures that the correct procedures and proper documentation for approval or adoption of a document have been performed. Finally, the staff report provides evidence for defense against legal challenges regarding the propriety of the approval or adoption of the document.

II. EXECUTIVE SUMMARY

The Federal Clean Air Act (FCAA) requires areas designated non-attainment and classified moderate and above to implement Reasonably Available Control Technology (RACT) for sources subject to Control Techniques Guidelines (CTG) documents issued by United States Environmental Protection Agency (USEPA) for "major sources" of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors. The District adopted the 2015 8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis) in February, 2015 which committed to amending Rule 1115 – Metal Parts & Products Coating Operations to current Federal RACT. The MDAQMD has a metal parts and products coating operations rule which was amended April 22, 1996 and approved as RACT into the SIP in 1997 (62 FR 67002, 12/23/1997). This rule is subject to the CTG titled Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings (EPA-453/R-08-003, September 2008), the CTG titled Control of Volatile Organic Emissions From Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products (EPA-450/2-78-015, June 1978), and the CTG titled Control Techniques Guidelines: Industrial Cleaning Solvents (EPA 453/R-06-001, September 2006). There are also two metal coating CTGs titled Control Techniques Guidelines for Large Appliance Coatings (EPA 453/R-07-004, September 2007) and Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, September 2007) for which the District has filed Federal Negative Declarations (February 23, 2015).

The District has several facilities that primarily coat metal parts and products and some additional facilities that coat metal parts and products as part of their operations. There are no facilities that meet the specific applicability threshold of the *CTG for Miscellaneous Metal and Plastic Parts*, but there are major facilities that coat metal parts and products. The MDAQMD is proposing to update Rule 1115 – *Miscellaneous Metal Parts & Products Coating Operations* to reflect current federal RACT.

Additionally, the provisions of Health & Safety Code (H&S Code) §39614(d) required the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by the

California Air Resources Board (CARB) contained in the *Proposed List of Measures to Reduce Particulate Matter – PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003)*. Former H&S Code §39614(d) (expired by its own terms on January 1, 2011) required the adoption of the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by CARB. Furthermore, this list required the adoption of Reasonably Available Control Measures (RACM) for PM. The proposed amendments to Rule 1115 satisfy both of these requirements.

The proposed amendments to Rule 1115 address the *RACT SIP Analysis* and former H&S Code §39614(d) commitments. The proposed amendments update rule definitions; transfer efficiency requirements; coating limits; control device efficiency; work practices; VOC content for strippers and surface preparation materials; test methods; and, record retention requirements. A prohibition of sale requirement has been reinserted in the rule as suggested in the August 1997 Technical Support Document for EPA's Notice of Direct Final Rulemaking for Rule 1115 (62 FR 67002, 12/23/1997). The proposed amendments are based on the CTGs, and various other district rules deemed as fulfilling RACT requirements, including but not limited to: South Coast Air Quality Management District Rule 1107 – *Coating of Metal Parts and Products*, amended 01/06/2006 (73 FR 70883, 11/24/2008); Placer County Air Pollution Control District Rule 245 – *Surface Coating of Metal Parts and Products*, amended 08/20/2009 (76 FR 30025, 5/24/2011); and, San Joaquin Valley Unified Air Pollution Control District Rule 4603 – *Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts*, amended 09/17/2009 (76 FR 67369, 11/01/2011).

III. STAFF RECOMMENDATION

Staff recommends that the Governing Board of the Mojave Desert Air Quality Management District (MDAQMD or District) amend proposed Rule 1115 – *Metal Parts & Products Coating Operations* and approve the appropriate California Environmental Quality Act (CEQA) documentation. This action is necessary to satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors. This amendment also satisfies a prior commitment to implement the provisions of H&S Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and cost-effective control measures for Particulate Matter from a list of potential local control measures promulgated by CARB.

The Governing Board of the Mojave Desert Air Quality Management District amended Rule 1115 – *Metal Parts & Products Coating Operations* on January 22, 2018.

IV. LEGAL REQUIREMENTS CHECKLIST

The findings and analysis as indicated below are required for the procedurally correct amendments to Rule 1115 – *Metal Parts & Products Coating Operations*. Each item is discussed, if applicable, in Section V. Copies of related documents are included in the appropriate appendices.

FINDINGS REQUIRED FOR RULES & REGULATIONS:

- X Necessity
- X Authority
- X Clarity
- X Consistency
- X Nonduplication
- X Reference
- X Public Notice & Comment
- X Public Hearing

REQUIREMENTS FOR STATE IMPLEMENTATION PLAN SUBMISSION (SIP):

- X Public Notice & Comment
- X Availability of Document
- X Notice to Specified Entities (State, Air Districts, USEPA, Other States)
- X Public Hearing
- \underline{X} Legal Authority to adopt and implement the document.
- \underline{X} Applicable State laws and regulations were followed.

ELEMENTS OF A FEDERAL SUBMISSION:

<u>X</u> Elements as set forth in applicable Federal law or regulations.

CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIREMENTS (CEQA):

- N/A Ministerial Action
- N/A Exemption
- X Negative Declaration
- N/A Environmental Impact Report
- X Appropriate findings, if necessary.
- X Public Notice & Comment

SUPPLEMENTAL ENVIRONMENTAL ANALYSIS (RULES & REGULATIONS ONLY):

- X Environmental impacts of compliance.
- N/A Mitigation of impacts.
- N/A Alternative methods of compliance.

OTHER:

- <u>X</u> Written analysis of existing air pollution control requirements
- N/A Economic Analysis
- X Public Review

V. DISCUSSION OF LEGAL REQUIREMENTS

A. REQUIRED ELEMENTS/FINDINGS

This section discusses the State of California statutory requirements that apply to the amendments to Rule 1115. These are actions that need to be performed and/or information that must be provided in order to amend the rule in a procedurally correct manner.

1. State Findings Required for Adoption of Rules & Regulations:

Before adopting, amending, or repealing a rule or regulation, the District Governing Board is required to make findings of necessity, authority, clarity, consistency, non-duplication, and reference based upon relevant information presented at the hearing. The information below is provided to assist the Board in making these findings.

a. Necessity:

The amendments to Rule 1115 are necessary to satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors. While the District does not have sources meeting the threshold in the CTGs it does have major facilities which coat metal parts and products and thus a rule is required. Additionally, the District is amending this rule to satisfy a prior commitment to implement the provisions of H&S Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and costeffective control measures for Particulate Matter from a list of potential local control measures promulgated by CARB.

b. Authority:

The District has the authority pursuant to California Health and Safety Code (H&S Code) §40702 to adopt, amend or repeal rules and regulations.

c. Clarity:

The amendments to Rule 1115 are clear in that they are written so that the persons subject to the rule can easily understand the meaning.

d. Consistency:

The amendments to Rule 1115 are in harmony with, and not in conflict with or contradictory to any state law or regulation, federal

law or regulation, or court decisions. The rule is consistent with the CTG provisions. When analyzed, the provisions of Rule 1115 were determined to be readily available, feasible and cost-effective for PM control measures promulgated by CARB.

e. Nonduplication:

The proposed amendments to Rule 1115 do not impose the same requirements as any existing state or federal law. CTGs and the CARB *Proposed List of Measures to Reduce Particulate Matter – PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003)* (former H&S Code §39614(d)) are primarily guidance documents and not enforceable in and of themselves. A rule is necessary to implement the applicable provisions of these documents.

f. Reference:

The District has the authority pursuant to H&S Code §40702 to adopt, amend or repeal rules and regulations.

g. Public Notice & Comment, Public Hearing:

Notice for the public hearing for the proposed amendments to Rule 1115 was published September 22, 2017 for the October 23, 2017 meeting. This item was continued to the January 22, 2018 Governing Board meeting to address comments from USEPA and industry. See Appendix "B" for a copy of the public notice. See Appendix "C" for copies of comments, if any, and District responses.

2. Federal Elements (SIP Submittals, Other Federal Submittals).

Submittals to USEPA are required to include various elements depending upon the type of document submitted and the underlying federal law that requires the submittal. The information below indicates which elements are required for the proposed amendments to of Rule 1115 and how they were satisfied.

a. Satisfaction of Underlying Federal Requirements:

The FCAA requires areas designated non-attainment and classified moderate and above to implement RACT for sources subject to CTG documents issued by USEPA for "major sources" of VOCs and NO_X that are ozone precursors. Because the District has an existing SIP rule for this CTG category, the District committed to adopting an updated RACT rule for metal parts and products coating operations. While the District does not have sources meeting the threshold in the CTGs it does have major facilities which coat metal parts and products and thus a rule is required. The proposed amendments are based on the CTGs and various

district rules deemed as fulfilling RACT requirements, including but not limited to: South Coast Air Quality Management District Rule 1107 – Coating of Metal Parts and Products; Placer County Air Pollution Control District Rule 245 – Surface Coating of Metal Parts and Products; and, San Joaquin Valley Unified Air Pollution Control District Rule 4603 – Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts.

b. Public Notice and Comment:

Notice for the public hearing for the proposed amendments to Rule 1115 was published September 22, 2017 for the October 23, 2017 meeting. This item was continued to the January 22, 2018 Governing Board meeting to address comments from USEPA and industry. See Appendix "B" for a copy of the public notice. See Appendix "C" for copies of comments, if any, and District responses.

c. Availability of Document:

Copies of the proposed amended Rule 1115 and the accompanying draft staff report were made available to the public on September 7, 2017. The proposed amendments were also reviewed by the Technical Advisory Committee (TAC), a committee consisting of a variety of regulated industry and local governmental entities, on August 7, 2017. The TAC had no objections on the preliminary draft of Rule 1115. The TAC reviewed the proposed rule amendments again on October 3, 2017. It was the consensus of the TAC to recommend submittal of Rule 1115 to the Governing Board for adoption on October 23, 2017. The TAC again reviewed the proposed draft of Rule 1115 on January 9, 2018. It was the consensus of the TAC to recommend submittal of Rule 1115 to the Governing Board for adoption.

d. Notice to Specified Entities:

Copies of proposed amended Rule 1115 and the accompanying draft staff report were sent to all affected agencies. The proposed amendments were sent to the California Air Resources Board (CARB) and USEPA on September 7, 2017.

e. Public Hearing:

A public hearing to consider the proposed amendments to of Rule 1115 was set for October 23, 2017. This item was continued to the next regularly scheduled meeting of January 22, 2018 to address substantive industry comment and comments from USEPA.

f. Legal Authority to Adopt and Implement:

The District has the authority pursuant to H&S Code §40702 to adopt, amend, or repeal rules and regulations and to do such acts as may be necessary or proper to execute the duties imposed upon the District.

g. Applicable State Laws and Regulations Were Followed:

Public notice and hearing procedures pursuant to H&S Code §§40725-40728 have been followed. See Section (V)(A)(1) above for compliance with state findings required pursuant to H&S Code §40727. See Section (V)(B) below for compliance with the required analysis of existing requirements pursuant to H&S Code §40727.2. See Section (V)(C) for compliance with economic analysis requirements pursuant to H&S Code §40920.6. See Section (V)(D) below for compliance with provisions of the CEQA.

B. WRITTEN ANALYSIS OF EXISTING REQUIREMENTS

H&S Code §40727.2 requires air districts to prepare a written analysis of all existing federal air pollution control requirements that apply to the same equipment or source type as the rule proposed for modification by the district.

The FCAA requires areas designated non-attainment for ozone and classified moderate and above to adopt and maintain RACT rules to control the emissions of VOCs and NO_X for categories which the USEPA has adopted a CTG and for all categories where there are major stationary sources of air pollution (42 U.S.C. §7511a(b)(2), FCAA 182(b)(2)). For purposes of the FCAA, portions of the District have been designated non-attainment for ozone and classified severe-17.

The MDAQMD has a metal parts and products coating operations rule which was amended April 22, 1996 and approved as RACT into the SIP in 1997 (62 FR 67002, 12/23/1997). This rule is subject to the CTG titled *Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings* (EPA-453/R-08-003, September 2008), the CTG titled *Control of Volatile Organic Emissions From Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products* (EPA-450/2-78-015, June 1978), and the CTG titled *Control Techniques Guidelines: Industrial Cleaning Solvents* (EPA 453/R-06-001, September 2006). There are also two metal coating CTGs titled *Control Techniques Guidelines for Large Appliance Coatings* (EPA 453/R-07-004, September 2007) and *Control Techniques Guidelines for Metal Furniture Coatings* (EPA 453/R-07-005, September 2007) for which the District has filed Federal Negative Declarations (February 23, 2015). The proposed amendments are based on the CTGs, and various district rules deemed as fulfilling RACT requirements, including but not limited to: South Coast Air Quality Management District Rule 1107 – Coating of Metal Parts and Products, amended 01/06/2006 (73 FR 70883, 11/24/2008); Placer County Air

Pollution Control District Rule 245 – *Surface Coating of Metal Parts and Products*, amended 08/20/2009 (76 FR 30025, 5/24/2011); and, San Joaquin Valley Unified Air Pollution Control District Rule 4603 – *Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts*, amended 09/17/2009 (76 FR 67369, 11/01/2011).

The District has several facilities that primarily coat metal parts and products, and additional facilities that coat metal parts and products as part of their operations. There are no facilities that meet the specific applicability threshold of the *CTG for Miscellaneous Metal and Plastic Parts*, but there are major facilities that coat metal parts and products.

Former H&S Code §39614(d) required the MDAQMD to adopt the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by CARB. CARB identified on its list of local control measures an item related to metal parts and products coating operations as potentially feasible. The District has evaluated the availability, feasibility and cost-effectiveness of applying those coating control measures related to metal parts and products coatings within the MDAQMD. The Proposed List of Measures to Reduce Particulate Matter – PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003) approved by CARB November 18, 2004, Appendix C (SB 656 List of Air District Measures that Reduce Particulate Matter) Strategy 74 – Metal Parts and Products Coatings, directed the District to evaluate Rule 1115 against SCAQMD Rule 1107 as amended 11/9/01. This strategy "Limits VOC emissions from the coating of metal parts and products not regulated by other specific regulations by limiting coating VOC content to between 2.3-3.5 lbs/gal depending on process and coating type." The District evaluated Rule 1115 against SCAQMD Rule 1107 – Coating of Metal Parts and Products, amended 01/06/2006. The District analyzed specified VOC limits concurrent with the RACT analysis and implemented those applicable SCAQMD VOC coating limits in the current amendment of Rule 1115, thereby meeting the obligation to former H&S Code §39614(d).

C. ECONOMIC ANALYSIS

1. General

RACT is defined as the lowest emissions limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility (44 FR 53762, September 17, 1979). Rule 1115 is equivalent to rules that were determined by USEPA to fulfill RACT ¹ This determination by USEPA means that the provisions of Rule 1115 are, by definition, cost effective.

¹ South Coast Air Quality Management District Rule 1107 – Coating of Metal Parts and Products, amended 01/06/2006 (73 FR 70883, 11/24/2008); Placer County Air Pollution Control District Rule 245 – Surface Coating of Metal Parts and Products, amended 08/20/2009 (76 FR 30025, 5/24/2011); and, San Joaquin Valley Unified Air Pollution Control District Rule 4603 – Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts, amended 09/17/2009 (76 FR 67369, 11/01/2011).

2. Incremental Cost Effectiveness

Pursuant to H&S Code §40920.6, incremental cost effectiveness calculations are required for rules and regulations which are adopted or amended to meet the California Clean Air Act (CCAA) requirements for Best Available Retrofit Control Technology (BARCT) or "all feasible measures" to control volatile compounds (VOCs), oxides of nitrogen (NOx) or oxides of sulfur (SOx). The amendment of Rule 1115 is not subject to incremental cost effectiveness calculations because it does not involve BARCT or "all feasible measures".

D. ENVIRONMENTAL ANALYSIS (CEQA)

Through the process described below the appropriate CEQA process for the proposed amendments to Rule 1115 was determined.

- 1. The amendments to Rule 1151 meet the CEQA definition of "project". They are not "ministerial" actions.
- 2. The amendments to Rule 1115 are exempt from CEQA review because the amendments will not create any adverse impacts on the environment. The rule amendments are more stringent than the previous rule version. Because there is no potential that the amendments might cause the release of additional air contaminants or create any adverse environmental impacts, a Class 8 categorical exemption (14 Cal. Code Reg. §15308) applies. Copies of the documents relating to CEQA can be found in Appendix "D".

E. SUPPLEMENTAL ENVIRONMENTAL ANALYSIS

1. Potential Environmental Impacts

There are no potential adverse environmental impacts of compliance with the adoption of Rule 1115. Rule 1115 will impose additional controls on VOCs, control device efficiency, work practices, surface preparation and cleanup solvent VOC limits.

2. Mitigation of Impacts

N/A.

3. Alternative Methods of Compliance

N/A

F. PUBLIC REVIEW

See Staff Report Section (V)(A)(1)(g) and (2)(b), as well as Appendix "B"

VI. TECHNICAL DISCUSSION

A. SOURCE DESCRIPTION

This Rule shall apply to all metal coating operations, except those performed on Aircraft or Aerospace Vehicles; Magnet Wire; Metal Containers, Closures and Coils; marine vessel exteriors; Motor Vehicles; Motor Vehicle Assembly Lines; Mobile Equipment; or those operations subject to the coating provisions of any other source-specific rule of the District.

B. EMISSIONS

The proposed amendments update rule definitions; transfer efficiency requirements; coating limits; control device efficiency; work practices; VOC content for strippers and surface preparation materials; test methods; and, record retention requirements. A requirement for prohibition of sale has been reinserted in the rule as suggested in the August 1997 Technical Support Document for EPA's Notice of Direct Final Rulemaking for Rule 1115 (62 FR 67002, 12/23/1997).

C. CONTROL REQUIREMENTS

Please see section (C) of the rule (Appendix A) for control requirements.

The amendments to Rule 1115 – *Metal Parts & Products Coating Operations* do not cause the release of additional air contaminants or create any environmental impacts.

Subsection (C)(1)(a) proposes application methods that are consistent with the CTG for Miscellaneous Metal and Plastic Parts Coatings. This subsection has also been modified to allow for the use of equipment approved for applying high viscosity coatings when the emissions are lower than those attained by HVLP equipment. Subsection (C)(2) coating limits have been adjusted to those that are consistent with current federal RACT limits. Drum coating categories contained in the CTG for Miscellaneous Metal and Plastic Parts Coatings have been added to the coating limits table. Subsection (C)(3) capture and control system combined efficiency has been changed from 85% to 90%. Subsection (C)(4) includes work practices from the CTG for Miscellaneous Metal and Plastic Parts Coatings. VOC limits for strippers and solvent cleaning materials have been updated to current federal RACT limits. Subsection (C)(6) reinserted within the rule as requested in EPA's Technical Support Document for Rule 1115, Metal Parts and Products Coating Operations, August 1997.

D. PROPOSED RULE SUMMARY

This section gives a brief overview of the proposed amendments to Rule 1151.

Minor format changes have been made throughout which are for consistency and not substantive. These changes include, but are not limited to, capitalization of defined terms, relocation of commonly defined terms to Rule 102, updating cross references, and including the complete titles of referenced rule and test method titles.

Section (B) has been modified to update existing definitions, remove unused definitions, remove definitions that are contained in Rule 102, and add definitions for specialty coating categories.

Definitions removed because already included in Rule 102, or relocated to Rule 102: Air Pollution Control Officer (APCO); Air-dried Coating; Baked Coating; California Air Resources Board (CARB); Control Device; District; High Volume, Low Pressure (HVLP) Spray; Motor Vehicle; United States Environmental Protection Agency (USEPA); Volatile Organic Compound (VOC).

Definitions modified to provide clarity and consistency: Electric-insulating Varnish; Extreme-performance Coating; High-performance Architectural Coating; Metallic Coating; Pretreatment Wash Primer; Touch-up Coating.

Definitions added: Chemical Agent Resistant Coating (CARC); Electrocoating (Electrodeposition); Electrostatic Spray; Multi-Component Coating; One-Component Coating; Stripper.

Subsection (C)(1) contains additional application methods added for consistency with the CTG for Miscellaneous Metal and Plastic Parts Coatings. This section has also been modified to allow for the use of equipment approved for applying high viscosity coatings when the emissions are lower than those attained by HVLP equipment. Additionally, APCO discretion has been modified to include CARB and USEPA. "Or" qualifier has been moved from end of subsection (xiii) to (ix).

Subsection (C)(2) coating limits have been adjusted to those that are consistent with current federal RACT limits. Drum coating categories contained in the CTG for Miscellaneous Metal and Plastic Parts Coatings have been added to the coating limits table.

Subsection (C)(2)(b) has been removed. This section was not applicable after April 22, 1998. This Section has been revised and renumbered as (C)(3) to incorporate an Sell Through and Use provision as requested by industry. There are only two existing rule categories that have been lowered and given a one year sell through and use accommodation. These categories are "General" and Military Specification".

Subsection (C)(4) capture and control system combined efficiency has been changed from 85% to 90%.

Subsection (C)(5) includes work practices from the CTG for Miscellaneous Metal and Plastic Parts Coatings. VOC limits for strippers and solvent cleaning materials have been updated to current federal RACT limits. Subsection (5)(b) was restructured at the recommendation of USEPA for clarity.

Subsection (C)(7) reinserted within the rule as requested in EPA's Technical Support Document for Rule 1115, Metal Parts and Products Coating Operations, August 1997.

Subsection (D)(7) has been added pursuant to industry request that high viscosity coatings may be exempt from transfer efficiency requirements if they meet certain criteria. See Staff Report Appendix "C" for comment and response. This provision is consistent with proposed language in SCAQMD rules 1168 and 1107.

Subsection (E)(2) has been removed. This section was not applicable after April 22, 1998. The current limits of the rule are applicable and are not proposed for change at this time.

Subsection (F)(1)(a) has been modified to properly incorporate reference to subsection (D)(5).

Subsection (F)(3) recordkeeping retention limit has been increased from 2 to 5 years as requested in EPA's Technical Support Document for Rule 1115, Metal Parts and Products Coating Operations, August 1997.

Section (G) updated to include full title and date of ASTM or EPA-approved state or local test methods being specified pursuant to USEPA Little Bluebook, August 21, 2001.

E. FCAA 110(1) (42 U.S.C. §7410(1)) ANALYSIS

Rule 1115 was originally adopted 03/02/92, and subsequently amended 04/22/96. The SIP approved version of Rule 1115 is the 04/22/96 amendment, approved at 62 FR 67002, 12/23/97. This version of the rule is the only rule applicable in the MDAQMD, including the Blythe/Palo Verde area of Riverside County that was acquired from the SCAQMD. The 110(l) analysis will be based on the differences between the 04/22/96 MDAQMD amendment and the current proposed amendment.

Several definitions have been relocated to existing Rule 102. Many terms are defined in multiple district rules. In addition, many of these definitions are exact or near exact duplicates of each other. Pursuant to Governing Board direction regarding streamlining, the Air Pollution Control Officer (APCO) has determined that shifting common definitions to Rule 102 and updating them for consistency will improve clarity. Reference to Rule 102 has been added to Rule 1115. Several definitions specific to Rule 1115 have been added or updated for consistency with the CTG or other RACT rules. Changes in definitions are more current and specific; therefore not a relaxation.

Additional application requirements have been added for consistency with the CTG for Miscellaneous Metal and Plastic Parts Coatings, which is intended to provide information to assist in determining RACT. Application methods are all required to have transfer efficiency at least equal to or better than HVLP as defined. As such, all application methods are at least as stringent to the existing requirements of the rule, therefore not a relaxation.

VOC coating categories and limits have been derived from the *CTG for Miscellaneous Metal and Plastic Parts Coatings* or other district rules. VOC limits have been tightened and are more stringent for consistency with the CTG and rules determined to meet federal RACT.

- "General" coating category has been separated to "General One-Component" and "General Multi-component." Both categories are lower than the existing Rule 1115 limits for Air-Dried and Baked categories and consistent with the CTG for Miscellaneous Metal and Plastic Parts Coatings. Those Districts with lower limits for "General One-Component" have rule applicability to two CTGs for which the District has filed Federal Negative Declarations: Control Techniques Guidelines for Large Appliance Coatings (EPA 453/R-07-004, September 2007) and Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, September 2007).
- "Military Specification" coating category has been lowered from the existing rule version limit to the limit contained in the CTG for Miscellaneous Metal and Plastic Parts Coatings.
- "Prefabricated Architectural Component" coating category has been separated to "Prefabricated Architectural One-Component" and "Prefabricated Architectural Multi-Component." Both categories are the same as existing limits for Air-Dried and Baked limits and consistent with the CTG for Miscellaneous Metal and Plastic Parts Coatings.
- "Drum (New, Exterior)", "Drum (New, Interior)", "Drum (Reconditioned, Exterior)" and "Drum (Reconditioned, Interior)" are new coating categories derived from the *CTG for Miscellaneous Metal and Plastic Parts Coatings*. The District has no sources subject to this CTG source category, and has not filed a FND for this source category. Incorporating these categories remedies the need to file a FND.
- "Chemical Agent Resistant Coating" category has been separated out and defined. San Diego APCD definition of CARC includes CARC provisions and the MDAQMD definition for Camouflage. For clarity, the MDAQMD added a separate CARC category in addition to the existing Camouflage category. The CARC coating category limit is the same as the existing Camouflage category limit. Addition of the CARC category is not a relaxation of the existing category limits.

Air Pollution control equipment capture and control system combined efficiency has been increased from 85% to 90%. This increase in efficiency strengthens the rule to the provisions in the CTG for Miscellaneous Metal and Plastic Parts Coatings.

Work practices have been incorporated from those provided in the *CTG for Miscellaneous Metal and Plastic Parts Coatings*. These practices expand and strengthen existing work practices.

VOC limit for surface cleaning and cleanup materials has been reduced from 200 grams or less of VOC per liter of material to 25 grams or less of VOC per liter of material. This is lower that the RACT limit set in the *CTG for Miscellaneous Metal and Plastic Parts Coatings*, meeting limits deemed RACT in subsequently adopted district rules. A VOC

limit for stripping was not specified in the previous amendment of Rule 1115. The District has proposed to retain a VOC limit for strippers of 200 grams or less of VOC per liter of material. This limit is not a relaxation, as strippers would previously have been assigned to the surface preparation and cleanup solvent category of 200 grams or less of VOC per liter of material. Strippers are separately defined with specific use restrictions. The provision for allowing a separate stripper limit is consistent with several rules deemed to meet RACT (Placer Rule 245 and Sacramento Metropolitan AQMD Rule 451).

A provision for "Prohibition of Sale" was reinserted within the rule as requested in *EPA's Technical Support Document for Rule 1115, Metal Parts and Products Coating Operations*, August 1997. This corrects a requested rule deficiency and strengthens the rule.

Record retention has been increased from 24 months to five years. This strengthens the rule.

Test methods have been updated pursuant to 40 CFR 60.17, USEPA Region 9 Air Emissions Test Methods, and USEPA Little Bluebook, August 21, 2001. This clarifies and strengthens the rule.

An exemption for Electric-insulating and Thermal-conducting coating has been added. Small use of specialized electric-insulating and thermal-conducting coating exists for companies that operate in the jurisdiction of multiple Air Districts. The specific product that has been referenced can be used to coat electrical connections, rotor windings, oil reservoirs, rotors and stators. An exemption is warranted because of the unavailability of general use coatings that provide the necessary performance these coatings provide. This exemption is also consistent with an exemption in SCAQMD Rule 1107, Northern Sierra AQMD Rule 228, and Santa Barbara County APCD Rule 330. Low usage could have previously been covered under the exemption allowing for total noncompliant coating use per facility that does not exceed 55 gallons per year, so this not a rule relaxation. Adding this exemption merely provides clarification for consistency and resemblance to neighboring district rules.

No part of the rule has been omitted, except those sections that have been superseded by date, or updated to current language. These minor changes and updates do not relax the rule.

F. SIP HISTORY

1. SIP History.

On July 1, 1993 the MDAQMD was formed pursuant to statute. Pursuant to statute it also retained all the rules and regulations of the San Bernardino County Air Pollution Control District (SBCAPCD) until such time as the Governing Board of the MDAQMD wished to adopt, amend or rescind such rules. The MDAQMD Governing Board, at its very first meeting, reaffirmed all the rules and regulations of the SBCAPCD. Rule 1115 was adopted 03/02/92 and subsequently

amended 04/22/1996. This 1996 version was also applicable to the Riverside County portion of the MDAQMD which was acquired from SCAQMD on 07/01/1994. The 04/22/1996 version was determined to fulfill RACT and was included in the State Implementation Plan (SIP) for the entire MDAQMD (62 FR 67002, 12/23/1997).

2. SIP Analysis.

The District will request CARB to submit the proposed amendments to Rule 1115 to replace the 1996 SIP version. While not specifically mentioned in the Direct Final Rule for the 04/22/1996 version of Rule 1115 (62 FR 67002, 12/23/1997), the District assumes that the approval action was for both the San Bernardino County portion of the MDAB and the Blythe/Palo Verde Valley portion of Riverside County, and that SCAQMD Rule 1107 – Coating of Metal Parts and Products was thereby removed from the SIP for the Blythe/Palo Verde Valley portion of Riverside County.

This submission is necessary to satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors.

Former H&S Code §39614(d) (expired by its own terms on January 1, 2011) required the adoption of the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by the CARB. In addition, this document required the adoption of Reasonably Available Control Measures (RACM) for PM. The proposed amendments to Rule 1115 satisfy both of these requirements as detailed in §(V)(B).

Since there are previously existing SIP rules for this category the District will request that they be superseded. In order to replace existing SIP rules the District is required to show that the proposed amendments are not less stringent than the provisions currently in the SIP. Proposed Rule 1115 is more stringent than the previous SIP version because the amendments update transfer efficiency requirements, coating limits, control device efficiency, work practices, VOC content for strippers and surface preparation materials, test methods, record retention requirements and add back in a requirement for prohibition of sale. Therefore, the proposed amendments to Rule 1115 are more stringent than the 1996 version of the rule.

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Appendix "A"

Rule 1151 – Metal Parts & Products Coating Operations Iterated Version

The iterated version is provided so that the changes to an existing rule may be easily found. The manner of differentiating text is as follows:

- 1. <u>Underlined text</u> identifies new or revised language.
- 2. Lined out text identifies language which is being deleted.
- 3. Normal text identifies the current language of the rule which will remain unchanged by the adoption of the proposed amendments.
- 4. [Bracketed italicized text] is explanatory material that is not part of the proposed language. It is removed once the proposed amendments are adopted.

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RULE 1115 Metal Parts & Products Coating Operations

(A) General

- (1) Purpose
 - (a) The purpose of this Rule is to limit the emission of Volatile Organic Compounds from the coating of Metal Parts and Products.
- (2) Applicability
 - (a) This Rule shall apply to all metal coating operations, except those performed on Aircraft or Aerospace Vehicles; Magnet Wire; Metal Containers, Closures and Coils; marine vessel exteriors; Motor Vehicles; Motor Vehicle Assembly Lines; Mobile Equipment; or those operations subject to the coating provisions of any other source-specific rule of the District.
 - (b) Any coating, coating operation, or facility which is exempt from all or a portion of the VOC limits of this Rule shall comply with the provisions of Rule 442.

(B) Definitions

The definitions contained in District Rule 102 – Definition of Terms shall apply unless the term is otherwise defined herein: [Definitions that are commonly used throughout the MDAQMD rule book have been relocated to existing Rule 102 which was most recently amended June 12, 2017, and will be amended concurrently with this amendment.] For the purpose of this Rule, the following definitions shall apply:

- (1) "<u>Adhesive</u>" Any substance that is used to bond surfaces together by adhesion.
- (2) "Aerosol Coating Product" A pressurized coating product containing pigments or resins that dispenses product ingredients by means of a propellant, and is packaged in a disposable can for hand-held application, or for use in specialized equipment for ground traffic/marking applications.
- (3) "Air Pollution Control Officer" (APCO) The person appointed to the position of Air Pollution Control Officer of the District pursuant to the provisions of California Health & Safety Code §40750, and his or her designee. [See District Rule 102 §(6).]
- (4<u>3</u>) "<u>Aircraft or Aerospace Vehicle</u>" Any fabricated part, assembly of parts or completed unit of any aircraft, helicopter, missile or space vehicle.

- (5) "Air-dried Coating" A coating that is cured at a temperature below 90°C (194°F). [Moved to Rule 102.]
- (64) "Assembly Line" An arrangement of industrial equipment and workers in which the product passes from one specialized operation to another until complete, either by automatic or manual means.
- (7) "Baked Coating" A coating that is cured at a temperature at or above 90°C (194°F). [Moved to Rule 102.]
- (85) "<u>Camouflage Coating</u>" A coating used, principally by the military, to conceal equipment from detection
- (9) "California Air Resources Board" (CARB) The California State Air Resources
 Board the powers and duties of which are described in Part 2 of Division 26 of the
 California Health & Safety Code (commencing with Section 39500). [See
 District Rule 102 §(14).]
- (6) "Chemical Agent Resistant Coating" (CARC) A coating applied to military tactical equipment in order to protect the equipment from chemical warfare agents. [Derived from SDAPCD Rule 67.3 (c)(5). Language for camouflage not incorporated as rule has a separate definition.]
- (107) "Clear Coating" A coating that either lacks color and opacity, or is transparent, and uses the surface to which it is applied as a reflective base or undertone color.
- (118) "Closure" Any component which is used to close or seal a filled can, jar or bottle.
- (12) "Coating" A material which is applied to a surface and which forms a continuous film in order to beautify and/or protect such surface. [See Rule 102.]
- (439) "Coil" Any flat metal sheet or strip that is rolled or wound in concentric rings.
- (14<u>10</u>) "<u>Combined Efficiency</u>" The capture efficiency multiplied by the <u>control Control</u> <u>device Equipment</u> efficiency, expressed as an overall weight percent.
- (15) "Compliance Assurance Monitoring" Total equipment, mechanism(s), and/or technique(s) used to demonstrate and insure compliance with the control device efficiency requirements stipulated in subsection (C)(3) of this Rule. Such monitoring is used to analyze and/or provide a permanent record of process parameters, such as temperatures, pressures and flow rates. [See Rule 102.]
- (1611) "Contract Painter" A non-manufacturer of Metal Parts and Products who applies coatings to such products at his facility exclusively under contract with one or more parties that operate under separate ownership and control.

- (17) "Control Device" Equipment used to reduce, by destruction or removal, the amount of air pollutant(s) in an air stream prior to discharge to the ambient air. [See District Rule 102 §(24) for Control Equipment.]
- (18) "<u>District</u>" The Mojave Desert Air Quality Management District the geographical area of which is described in District Rule 103. [See District Rule 102 §(25)]
- (1912) "Drum" Any cylindrical metal shipping container of 13 to 110 gallon capacity.
- (13) "Electric-insulating and Thermal-conducting Coating" A Coating that displays an electrical insulation of at least 1000 volts DC per mil on a flat test plate and an average thermal conductivity of at least 0.27 BTU per hour-foot-degree-Fahrenheit. [Derived from SCAQMD Rule 1107, Santa Barbara County APCD Rule 330 and Northern Sierra County APCD Rule 228.]
- (2014) "Electric-insulating Varnish" A non-convertible-type coating applied to electrical motors, or components of electrical motors, or power transformers, to provide electrical, mechanical, and environmental protection or resistance.

 [Updated with definition from CTG for Miscellaneous Metal and Plastic Parts Coatings.]
- (15) "Electrocoating (Electrodeposition)" A process that uses Coating concentrates or pastes added to a water bath. The coating is applied using either an electric current in either an anodic or cathodic bath. [Derived from SCAQMD Rule 1107(b)(13), Placer County APCD Rule 245 §221.]
- (16) "Electrostatic Spray" A Coating application method accomplished by charging atomized paint particles for deposition by electrostatic attraction on a metal part or product. [Derived from SDAPCD Rule 67.3 (c)(10).]
- (2117) "Etching Filler" A coating that contains less than 23 percent solids by weight and at least 1/2 percent acid by weight, and is used instead of applying a pretreatment coating followed by a primer.
- (2218) "Extreme high-gloss Coating" A coating which, when tested by the American Society for Testing Material (ASTM) Method D-523-1980 adopted in 1980, shows a reflectance of 75 percent or more on a 60°— meter.
- (2319) "Extreme-performance Coating" A coating used on a metal surface where the coated surface is, in its intended use, exposed to any of the following: [Modified to reflect CTG for Miscellaneous Metal and Plastic Parts Coatings definition.]
 - (a) Repeated heavy abrasion, including mechanical wear and repeated scrubbing with Industrial or abrasive scouring agents;

 Repeated heavy abrasion, including mechanical wear and repeated scrubbing with Industrial or abrasive scouring agents;

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- (b) Frequent or chronic exposure to salt water, corrosives, caustics, acids, oxidizing agents, chemicals, chemical fumes, chemical mixtures or solutions; or
- (c) Repeated exposure to temperatures in excess of 250°F;
- (c) Other similar environmental conditions as determined in writing by the District's APCO, pursuant to subsection (E)(2) of this Rule. <u>[Section</u> (E)(2) is no longer applicable.]

Extreme performance coatings include, but are not limited to, coatings applied to locomotives, railroad cars, farm machinery, and heavy duty trucks.

(24) "Grams of VOC per liter of coating, less water and less exempt compounds"—
The weight of VOC per combined volume of VOC and coating solids when calculated by the following equation: [See definition in Rule 102, and equation in §(G)(3).]

$$\frac{Grams\ VOC_{(less\ water\ and\ exempt\ compounds)}}{Liter\ of\ Coating} = \underbrace{\begin{bmatrix} \left(W_s - W_w - W_{es}\right) / \\ \left(V_m - V_w - V_{es}\right) \end{bmatrix}}_{}$$

Where:

W_s = weight of volatile compounds in grams, including water and exempt compounds

 $W_w =$ weight of water in grams

W_{es} = weight of exempt compounds in grams

 $V_{m} = \frac{\text{volume of material in liters, including water and exempt}}{\text{compounds}}$

V_w = volume of water in liters

V_{es} = volume of exempt compounds in liters

(25) "Grams of VOC per liter of material" - The weight of VOC per volume of material when calculated by the following equation: [See definition in Rule 102, and equation in $\S(G)(3)$.]

Grams of VOC per Liter of Material =
$$\begin{bmatrix} (W_s - W_w - W_{es}) / \\ / V_m \end{bmatrix}$$

Where:

W_s = weight of volatile compounds in grams, including water and exempt compounds

W_w = weight of water in grams

W_{es} = weight of exempt compounds in grams

V_m = volume of material in liters, including water and exempt compounds

- (2620) "Hand Application Methods" The application of coatings by manually held, non-mechanically operated equipment. Such equipment includes paint brushes, hand rollers, caulking guns, trowels, spatulas, syringe daubers, rags and sponges.
- (2721) "Heat-resistant Coating" A coating that must withstand a temperature of at least 400°F (204°C) during normal use.
- (2822) "<u>High-gloss Coating</u>" A coating which, when tested in accordance with ASTM Method D-523-89 adopted in 1989, shows a reflectance of 85 percent or more on a 60° meter.
- (2923) "High-performance Architectural Coating" A coating used to protect architectural subsections and which meets the requirements of the Architectural Aluminum Manufacturer Association's publication number AAMA 605.2-19802604-05 (Voluntary Specification, Performance Requirements and Test Procedures for High Performance Organic Coatings on Aluminum Extrusions and Panels) or 2605-05 (Voluntary Specification, Performance Requirements and Test Procedures for Superior Performing Organic Coatings on Aluminum Extrusions and Panels). [Updated for consistency with the CTG for Miscellaneous Metal and Plastic Parts.]
- (3024) "High-temperature Coating" A coating that is certified to withstand a temperature of 1000° oF for 24 hours.
- (31) "High-Volume, Low-Pressure (HVLP) Spray" Equipment used to apply coatings by means of a gun which operates at a permanent pressure of between 0.1 and 10 psig, measured at the air cap of the coating application system, and a permanent liquid coating pressure of not more than 50 psig. [See District Rule 102 § (48)]
- (3225) "Ink" A fluid that contains dyes and/or colorants and is used to make markings but not to protect surfaces.
- (3326) "Magnetic Data Storage Disk Coating" A coating used on a metal disk which stores data magnetically.
- (3427) "Magnet Wire" Wire used in electro-magnetic field application in electrical equipment, such as transformers, motors, generators, and magnetic tape recorders.

- (3528) "Metal Container, Closure and Coil Coating Operations" The application of any VOC-containing coating to the surfaces of metal cans, Drums, Pails, lids, Closures, or to the surface of flat metal sheets, strips, rolls, or Coils during the manufacturing and/or reconditioning process.
- (29) "Metallic Coating" A coating which contains more than five (5) grams of metal particles per liter of coating, as applied. Metal Particles are pieces of a pure elemental metal or a combination of elemental metals. [Modified to reflect CTG for Miscellaneous Metal and Plastic Parts Coatings definition.]
- (3630) "Metal Parts and Products" Any components or complete units fabricated from metal, excluding Aircraft or Aerospace Vehicles, Magnet Wire, Metal Containers, Closures and Coils, marine vessel exteriors, Motor Vehicles, Motor Vehicle Assembly Lines, Mobile Equipment or those subject to the coating provisions of any other source-specific rule of the District.
- (37) "Metallic Coating" A coating which contains more than 5 grams of metal per liter of coating, as applied. [Alphabetized. See (B)(29)
- (3831) "Military Specification Coating" A coating applied to Metal Parts and Products and which has a paint formulation approved by a United States Military Agency for use on military equipment.
- (3932) "Mobile Equipment" Any equipment which may be drawn or is capable of being driven on a roadway, including, but not limited to, truck bodies, truck trailers, camper shells, mobile cranes, bulldozers, street cleaners, golf carts and implements of husbandry.
- (4033) "Mold-seal Coating" The initial coating applied to a new mold or repaired mold to provide a smooth surface which, when coated with a mold release coating, prevents products from sticking to the mold.
- (41) "Motor Vehicle" A passenger vehicle, light-duty truck, medium-duty vehicle, or a heavy-duty vehicle as defined in Section 415 of the California Vehicle Code.[See District Rule 102 §(52).]
- (4234) "Motor Vehicle Rework" The reconditioning of Motor Vehicles.
- (35) "Multi-Component Coating" A coating requiring the addition of a separate reactive resin, commonly known as a catalyst or hardener, before application to form an acceptable dry film. [Modified to reflect CTG for Miscellaneous Metal and Plastic Parts Coatings definition.]
- (36) "One-Component Coating" A coating that is ready for application as it comes out of its container to form an acceptable dry film. A thinner, necessary to reduce the viscosity, is not considered a component. [Modified to reflect CTG for Miscellaneous Metal and Plastic Parts Coatings definition.]

- (43<u>37</u>) "<u>Pail</u>" Any cylindrical metal shipping container of at least 1 but less than 13 gallon capacity and constructed of 29 gauge or heavier material.
- (4438) "<u>Pan-backing Coating</u>" A coating applied to the surface of pots, pans, or other cooking implements that are exposed directly to a flame or other heating elements.
- (4539) "Performance Test" A test conducted primarily for the purpose of researching and developing new processes and products, that is conducted under the close supervision of technically trained personnel, and that is not involved in the manufacture of final or intermediate products for commercial purposes, except in a de minimis manner.
- (4640) "Prefabricated Architectural Component Coatings" Coatings applied to Metal Parts and Products which are to be used as an architectural structure.
- (4741) "Pretreatment Wash Primer" Any coating which contains no more than 12 percent solids by weight, and a minimum of 0.5 percent acid by weight, is necessary to provide surface etching and is applied directly to bare metal surfaces to provide corrosion resistance and adhesion, and ease of Stripping. [Modified to reflect CTG for Miscellaneous Metal and Plastic Parts Coatings definition.]
- (4842) "Repair Coating" A coating used to recoat portions of a product which has sustained mechanical damage to the original coating following normal painting operations.
- (4943) "Safety-indicating Coating" A coating which changes physical characteristics, such as color, to indicate unsafe conditions.
- (5044) "Silicone-release Coating" Any coating which contains silicone resin and is intended to prevent food from sticking to metal surfaces such as baking pans.
- (5145) "Solar-absorbent Coating" A coating which has as its primary purpose the absorption of solar radiation.
- (5246) "Solid-film Lubricant" Any very thin coating consisting of a binder system, containing primarily one or more of molybdenum disulfide, graphite, polytetrafluoroethylene (PTFE) or other solids which act as dry lubricants between faying surfaces.
- (5347) "Stencil Coating" An ink or a <u>pigmented</u> coating which is rolled or brushed onto a template or stamp for the purpose of adding identifying letters, numbers and/or other markings to Metal Parts and Products.
- (48) "Stripper" A material applied to the surface of any metal part of product to completely remove maskants, coatings or coating residues. A stripper is not a surface preparation material or cleanup material. Material used for removal of overspray is not a stripper. [Derived from PCAPCD Rule 245 §265.]

- (5449) "Surface Preparation" The removal of contaminants, including dust, oil and grease, prior to coating applications.
- (55<u>50</u>) "<u>Textured Finish</u>" Any rough surface produced by spraying large drops of coating onto a previously coated surface.
- (5651) "Theoretical Potential Emissions" The maximum capacity of a stationary source to emit a regulated air pollutant, based on the greater of design capacity or maximum production (based on 8760 hours/year), before add on controls.
- (5752) "Touch-up Coating" A coating applied by brush or hand-held, non-refillable aerosol cans to repair minor surface damage and imperfections after the main coating operation. [Modified for clarity.]
- (58) "Transfer Efficiency" The ratio of the weight or volume of coating solids adhering to an object to the total weight or volume of coating solids used in the application process, expressed as a percentage. [See Rule 102.]
- (59) "<u>United States Environmental Protection Agency</u>" (USEPA) The United States Environmental Protection Agency, the Administrator of the USEPA and his or her authorized representative. [See District Rule 102.]]
- (6053) "Vacuum-metalizing Coating" The undercoat applied to the substrate on which the metal is deposited or the overcoat applied directly to the metal film.
- (61) "Volatile Organic Compound (VOC)" Any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions and those compounds listed in 40 CFR 51.100(s)(1). [See District Rule 102 § (98)].

(C) Requirements

- (1) Transfer Efficiency
 - (a) A person shall not apply any coatings to Metal Parts and Products subject to the provisions of this Rule, unless the coating is applied with equipment properly operated according to manufacturer's suggested guidelines, and using one of the following application methods: [Additional application methods added for consistency with the CTG for Miscellaneous Metal and Plastic Parts Coatings.]
 - (i) Electrostatic attraction Spray; or
 - (ii) High Volume Low Pressure (HVLP) Spray equipment; or
 - (iii) Dip coat (including electrodeposition); or [Defined in Rule 102.]
 - (iv) Flow coat; [Defined in Rule 102.]

- (v) Roller Coat; [Defined in Rule 102.]
- (vi) Airless spray;
- (vii) Air-assisted airless spray;
- (iviii) Hand Application Methods; or
- (vix) Other coating application methods as are demonstrated to have a Transfer Efficiency at least equal to one or better than achieved by HVLP spraying; or of the above methods, and which are used in such a manner that the parameters under which they were tested are permanent features of the method. Prior to their use, such coating applications shall be approved in writing by the APCO.
- Equipment as approved by the APCO, CARB and USEPA, provided that the owner/operator submits an application and demonstrates that the use of HVLP spray equipment would result in greater emissions than the proposed system equipment. The approval shall be limited to only those coatings listed in the application plan. [Added pursuant to industry request that high viscosity coatings may be exempt from transfer efficiency requirements if they meet certain criteria. Derived from SCAQMD Proposed Amended Rule 1107, 7/10/12. See Staff Report Appendix "C" for public comment and response. "Or" relocated to between (C)(1)(a)(ix) and (C)(1)(a)(x) pursuant to USEPA verbal comment, 12/18/17. Typographical error corrected (listen to listed) pursuant to USEPA verbal comment, 12/18/17.]

(2) VOC Content of Coatings :

(a) A person shall not apply any coating to Metal Parts and Products, including any VOC-containing materials added to the original coating supplied by the manufacturer, which contains VOC in excess of the limits specified in subsection (C)(2)(a)(i) below:

(i) COATING LIMITS

(Grams of VOC Per Liter of Coating, Less Water and Less Exempt Compounds)

Coating Category	Air-Dried		<u>Baked</u>	
	g/L	lb/gal	g/L	lb/gal
General One-component*	4 20 340	(3.52.8)	360 <u>275</u>	(3.02.3)
General Multi-Component*	<u>340</u>	(2.8)	<u>275</u>	(2.3)
Military Specification	4 20 340	(3.52.8)	360 <u>275</u>	(3.02.3)
Etching Filler	420	(3.5)	420	(3.5)
Solar-Absorbent	420	(3.5)	360	3.0)
Heat-Resistant	420	(3.5)	360	(3.0)
High-Gloss	420	(3.5)	360	(3.0)

Coating Category	Air-Dried		Baked	
	g/L	lb/gal	g/L	lb/gal
Extreme High-Gloss	420	(3.5)	360	(3.0)
Metallic	420	(3.5)	420	(3.5)
Extreme-Performance	420	(3.5)	360	(3.0)
Prefabricated Architectural	420	(3.5)	275	(2.3)
-Component		(0.0)		(=:0)
Prefabricated Architectural One- Component	<u>420</u>	(3.5)	<u>275</u>	(2.3)
Prefabricated Architectural Multi-	<u>420</u>	(3.5	<u>275</u>	(2.3)
Component Taranta III.#				
—Touch-Up [#]	420	(3.5)	360	(3.0)
—Repair [#] ——	420	(3.5)	360	(3.0)
—Silicone-Release [#]	420	(3.5)	420	(3.5)
XX 1 D C				
High-Performance	420	(3.5)	420	(3.5)
Architectural		, ,		` '
—Camouflage [#]	420	(3.5)	420	(3.5)
—Vacuum-Metalizing [#]	420	(3.5)	420	(3.5)
—Mold-Seal [#]	420	(3.5)	420	(3.5)
—High-Temperature [#]	420	(3.5)	420	(3.5)
Electric-Insulating Varnish	420	(3.5)	420	(3.5)
—Pan-Backing [#]	420	(3.5)	420	(3.5)
Pretreatment Wash Primer	420	(3.5)	420	(3.5)
Clear Coating	520	(4.3)	520	(4.3)
Drum (New, Exterior) ⁺	<u>340</u>	(2.8)	<u>340</u>	(2.8)
Drum (New, Interior) ⁺	<u>420</u>	(3.5)	<u>420</u>	(3.5)
<u>Drum (Reconditioned, Exterior)</u> ⁺	<u>420</u>	(3.5)	<u>420</u>	(3.5)
<u>Drum (Reconditioned, Interior)</u> ⁺	<u>500</u>	(4.2)	<u>500</u>	(4.2)
Chemical Agent Resistant [@]	<u>420</u>	(3.5)	<u>420</u>	(3.5)

^{*}A General Coating is a coating that does not meet a specific coating category definition and is assumed to be a general use coating and subject to the VOC limit for a General Coating.

^{*}Specified categories appeared to be subcategories of either "Prefabricated Architectural" or "High Performance

Architectural" in the previous rule version. These are actually stand-alone categories. Format has been changed to properly reflect this status.

⁺Coating Categories and limits derived from CTG for Miscellaneous Metal and Plastic Parts Coatings.

(3) Sell-Through and Use of Coatings

(ab) The provisions of subsection (C)(2)(a)(i) above shall not apply to Extreme Performance Coatings used at military installations the General or Military Specification Coating Category limits and subject to the provisions of this Rule until April 22, 1998 (one year from rule amendment). In the interim, a person shall not apply any Extreme Performance Coating at such installations which contains VOC in excess of the following limits, after the specified date: Until (one year from rule amendment), the following limits shall apply:

Category	Air-Dried		Baked	
	g/L	<u>lb/gal</u>	<u>g/L</u>	<u>lb/gal</u>
General (One- or Multi- Component)	<u>420</u>	(3.5)	<u>360</u>	(3.0)
Military Specification	<u>420</u>	(3.5)	<u>360</u>	(3.0)

(i) On or after April 22, 1996:

Air-Dried		<u>Baked</u>		
g/L	lb/gal	g/L	lb/gal	
588	(4.9)	588	(4.9)	

(ii) Any person seeking the use an Extreme Performance coating subject to the provisions specified in this subsection shall submit an Extreme Performance Coating Petition, pursuant to the requirements of subsection (E)(2).

[This section was not applicable after April 22, 1998. The section has been modified to allow a reasonable time for users of these products to sell or use materials on hand.]

- (43) Add-On Control Alternative
 - (a) In lieu of complying with the VOC content limitations in subsection (C)(2) and (C)(3) above, air pollution control equipment with a capture and control system Combined Efficiency of at least 8590%, as determined pursuant to subsections (G)(2)(g) and (G)(2)(h) of this Rule, may be used.

 [Updated for consistency with the CTG for Miscellaneous Metal and Plastic Parts Coatings to meet current federal RACT.]
- (54) <u>Strippers</u>, Surface Preparation and Cleanup Solvent

- (a) The requirements of this Section shall apply to any person using solvent for Surface Preparation, cleanup, <u>stripping</u>, and paint removal, including paint spray equipment.
- (b) A person shall not use VOC-containing materials for the cleanup of application equipment used in coating operations, unless: such material is collected in a closed container when not in use; and [See (ii) below.

 Following subsections reorganized for clarity pursuant to USEPA verbal comment, 12/18/17.]
 - (i) Application equipment cleaning equipment requirements:
 - a. The application equipment is disassembled and cleaned in an enclosed system during the washing, rinsing and draining processes; or
 - (ii) <u>b.</u> The application equipment or equipment parts are cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning material is being added, provided the cleaned equipment or equipment parts are drained to the container until dripping ceases; or
 - (iii) ______Other application equipment cleaning methods that are demonstrated to be as effective as the equipment described above in minimizing emissions of VOC to the atmosphere are used, provided that the device has been approved in writing prior to use by the APCO, CARB and USEPA. [APCO discretion eliminated pursuant to USEPA verbal comment, 12/18/17.]
 - (ii) Closed containers or pipes to store and convey VOC-containing cleaning and cleaning waste materials are used; [Derived from CTG for Miscellaneous Metal and Plastic Parts Coating work practices.]
 - (iii) Spills of VOC-containing cleaning and cleaning waste materials are minimized; or [Derived from CTG for Miscellaneous Metal and Plastic Parts Coating work practices.]
 - (iv) VOC emissions are minimized during cleaning operations; or [Derived from CTG for Miscellaneous Metal and Plastic Parts Coating work practices.]
- (c) A person shall not use VOC-containing materials for Surface Preparation and cleanup unless:
 - (i) The material contains 2500 grams or less of VOC per liter of material (0.211.67 pounds per gallon); or
 - (ii) The material has an initial boiling point of 190°C (374°F) or greater; or

- (iii) The material has a total VOC vapor pressure of <u>820</u> mm Hg or less, at 20°C (68°F). *[Updated value from CTG: Industrial Cleaning Solvents.]*
- (d) A person shall not use a Stripper on miscellaneous metal parts and products unless: [Derived from SMAQMD Rule 451-8 §303 and PCAPCD Rule 245 §303.]
 - (i) The material contains 200 grams or less of VOC per liter of material (1.7 pounds per gallon).
- (ed) A person shall use closed, nonabsorbent containers for the storage or disposal of cloth, paper, or any other absorbent material used for solvent Surface Preparation and cleanup.
- (65) Prohibition of Specifications:
 - A person shall not specify the use in the District of any coating to be applied to any metal parts and products subject to the provisions of this Rule, that does not meet the limits and requirements of this Rule.

(7) Prohibition of Sale

- (a) A person shall not offer for sale or sell within the District any coating, if such product is prohibited by any provisions of this Rule. The prohibition of this section shall apply to the sale of any coating which will be applied at any physical location within the District. [Derived from MDAQMD Rule 1115 §(C)(6), Draft 5D, 3/13/96. This section reinserted within the rule as requested in EPA's Technical Support Document for Rule 1115, Metal Parts and Products Coating Operations, August 1997.
- (86) Compliance Statement Requirement:
 - (a) The manufacturer of coatings subject to this Rule shall provide on coating containers or on separate data sheets the designation of VOC content as supplied, including coating constituents. The VOC content shall be expressed in grams per liter or pounds per gallon, excluding water and exempt solvents.
- (97) Compliance Assurance Monitoring
 - (a) Any coating operation subject to subsection (C)(43) shall utilize Compliance Assurance Monitoring, as approved by the APCO, for any add-on Control Device Equipment used to meet the control requirement. [Updated for consistency with Rule 102 definition.]
 - (b) Records of the monitoring device(s), mechanisms and/or techniques, and other data necessary to demonstrate compliance with the control

- requirements, shall be maintained and produced upon request of the APCO, pursuant to Section (F).
- (c) Compliance with the add-on control requirements stipulated in subsection (C)(43) shall be determined by source testing and/or evaluating Compliance Assurance Monitoring data.
- (d) Each monitoring device(s), mechanism and/or technique shall be calibrated/maintained in a manner approved by the APCO.

(D) Exemptions

- (1) The provisions of this Rule shall not apply to aerosol coating products.
- (2) The provisions of subsection (C)(2), (C)(3) and (C)(43) of this Rule shall not apply to any facility that does not exceed 10 tons per year Theoretical Potential Emissions of VOC, as defined in subsection (B)(5654), subject to the following conditions:
 - (a) Any person claiming exemption under this paragraph shall meet the certification requirements specified in subsection (E)(1) and the recordkeeping requirements specified in Section (F); and
 - (b) Any facility operating under this exemption whose emissions exceed 10 tons on an annual basis shall henceforth be subject to subsections (C)(2), (C)(3) and (C)(43) of this Rule.
- (3) The provisions of subsections (C)(1), (C)(2), (C)(3) and (C)(43) of this Rule shall not apply to:
 - (a) Any facility which has a daily usage of less than one (1) gallon of coating, including any VOC-containing materials added to the original coating as supplied by the manufacturer, subject to this Rule;
 - (b) Total noncompliant coating use per facility that does not exceed 55 gallons per year;
 - (c) Stencil Coatings:
 - (d) Safety-indicating Coatings;
 - (e) Magnetic Data Storage Disk Coatings;
 - (f) Solid-film Lubricants;
 - (g) Adhesives;
 - (h) The coating of Motor Vehicle bodies at Motor Vehicle Rework facilities:

- (i) Electric-insulating and thermal conducting coatings. [Derived from SCAQMD Rule 1107, Santa Barbara County APCD Rule 330, and Northern Sierra AQMD Rule 228.]
- (4) The provisions of subsection (C)(1) of this Rule shall not apply to Contract Painters while applying coatings to objects on trays, provided no object has any dimension greater than 12 inches.
- (5) The provisions of subsection (C)(1) of this Rule shall not apply to the application of Touch-up Coatings, Repair Coatings, Textured coatings, Metallic Coatings which have a metallic content of more than 30 grams per liter, Mold-seal Coatings, or to facilities that use less than three (3) gallons of such coatings per day, as applied, including any VOC-containing materials added to the original coatings as supplied by the manufacturer.
- (6) The provisions of subsections (C)(1), (C)(2), (C)(3), (C)(43) and (C)(54) of this Rule shall not apply to the application of coatings and use of cleaning solvents while conducting Performance Tests on the coatings at paint manufacturing facilities.
- The provisions of subsection (C)(1)(a)(ix) shall not apply to metal coatings with a viscosity of 650 centipoise or greater, as applied, so long as (C)(1)(a)(x) is complied with. [Added pursuant to industry request that high viscosity coatings may be exempt from transfer efficiency requirements if they meet certain criteria. See Staff Report Appendix "C" for public comment and response.]

(E) Administrative Requirements

- (1) Certification Requirements for Facilities with Theoretical Potential Emissions of 10 Tons VOC or Less per Year:
 - (a) Any person claiming an exemption under subsection (D)(2) of this Rule shall certify the exemption on an annual basis, by:
 - (i) Submitting a written certification to the APCO certifying that the affected facility shall not emit VOCs in excess of 10 tons annually. At a minimum, the certification shall include the following information:
 - <u>a</u>**1**. A summary of past annual usage of VOC-containing materials and related emissions; and
 - <u>b2</u>. The facility's Theoretical Potential Emissions of VOC, as defined in subsection (B)(5<u>1</u>6). <u>[Updated citation and numbering convention.]</u>
- (2) Extreme Performance Coating Petition Military Installations Only (Required through April 22, 1998)

- (a) Any person seeking to use an Extreme-performance Coating in any military coating operation which is subject to the provisions of this Rule shall comply with the following requirements, prior to the application of such coating:
 - (i) A petition shall be submitted to the APCO stating the performance requirements, volume of coating, and VOC level which is attainable. Attainable VOC level must comply with the VOC limits and associated compliance dates set forth in subsection (C)(2)(b).
 - (ii) If the APCO grants written approval, such petition shall be resubmitted for approval on an annual basis. Approval of subsequent petitions shall be granted only through April 22, 1998.
 - (iii) If the APCO grants written approval, such approval shall contain volume and VOC limit conditions.
 - (iv) Records shall be maintained pursuant to Section (F).

[The provisions of this section are no longer applicable. The current limits of the rule have been applicable to military installations since April 22, 1998 and are not proposed for change at this time. There is no need for a special petition for usage of Extreme Performance Coating at military installations any longer.]

(F) Monitoring and Records

- (1) Coating Records
 - (a) Any facility or person claiming exemption pursuant to subsections (D)(2), (D)(3)(a)₂-or (D)(3)(b) or (D)(5) shall meet the recordkeeping requirements of this Rule so as to be able to certify the exemption status.

 [Reference updated for completeness pursuant to USEPA verbal comment, 12/18/17.]
 - (b) Any person subject to subsections (C)(1), (C)(2), (C)(3), (C)(43), (C)(54) or (F)(1)(a) shall comply with the following requirements: <u>[Updated numbering convention.]</u>
 - (i) The person shall maintain and produce a current list of coatings in use which provides all of the coating data necessary to evaluate compliance, including, but not limited to, the following information, as applicable:
 - <u>a</u>1. coating, catalyst, and reducer used.
 - <u>b2</u>. mix ratio of components used.
 - c3. VOC content of coating as applied.
 - (ii) The person shall maintain and produce records on a daily basis, by permit unit, including:
 - <u>a</u>1. coating and mix ratio of components used in the coating; and

- <u>b2</u>. quantity of each coating applied.
- (iii) The person shall maintain and produce records on a daily basis showing the type and amount of solvent used for cleanup, Surface Preparation, or paint removal.
- (c) Any facility or person claiming an exemption pursuant to <u>subs</u>Section (D)(2) of this Rule shall maintain and produce records of purchase orders and invoices of VOC-containing materials which specify the name of the materials in use. The requirements of this paragraph shall be in addition to all other applicable recordkeeping requirements specified in this Section.
- (2) Add-on Control Equipment Records
 - (a) Any person using-an emission Control Device Equipmentor system, pursuant to subsection (C)(43), shall maintain and produce daily records of key system operating parameters and maintenance procedures which will demonstrate continuous operation and compliance of the emissions Control Device Equipment during periods of emissions-producing activities. Key system operating parameters are those necessary to ensure compliance with VOC content of coating requirements, such as temperatures, pressures and flow rates. [Updated for consistency with Rule 102 definition.]
- (3) All records for the previous 24 month five (5) year period maintained and produced pursuant to this Section shall be retained and available for inspection by the APCO upon request. <u>[Updated as requested in EPA's Technical Support Document for Rule 1115, Metal Parts and Products Coating Operations, August 1997.]</u>
- (G) Test Methods [Updated pursuant to 40 CFR 60.17, USEPA Region 9 Air Emissions Test Methods, and USEPA Little Bluebook, August 21, 2001.]
 - (1) A violation of the limits contained in this Rule, as determined by any one of the test methods listed below, shall constitute a violation of this Rule.
 - (2) The following specified test methods shall be used to determine compliance with the provisions of this Rule:
 - (a) The VOC content of coatings and solvents, as specified in subsections (C)(2), (C)(3), and (C)(54)(c)(i) and (C)(5)(d)(i), shall be analyzed as prescribed by USEPA Reference Method 24 Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings for VOC content (without correction for exempt compounds) and ASTM D4457-85 Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph, or CARB Method 432 Determination of Dichloromethane and 1,1,1 -

MDAQMD Rule 1115 1115-17

- <u>Trichloroethane in Paints and Coatings (09/12/1989)</u>, for determination of emissions of exempt compounds. Perfluorocarbon compounds shall be assumed to be absent from a product or process unless a manufacturer or facility operator identifies the specific individual compounds (from the broad classes of perfluorocarbon compounds) and the amounts present in the product or process and provides a validated test method which can be used to quantify the specific compounds.
- (b) Determination of the initial boiling point of liquid containing VOC, subject to subsection (C)(54)(c)(ii), shall be conducted in accordance with ASTM D1078-86 Test Method for Distillation Range of Volatile Organic Liquids.
- (c) Calculation of total VOC vapor pressure for materials subject to subsection (C)(54)(c)(iii) shall be conducted in accordance with ASTM D2879-8697 Test Method for Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope. The fraction of water and exempt compounds in the liquid phase shall be determined by using ASTM D3792-91 Test Method for Water Content of Water-Reducible Paints by Direct Injection into a Gas Chromatograph and D4457-85 Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph and shall be used to calculate the partial pressure of water and exempt compounds. The results of vapor pressure measurements obtained using ASTM D2879-9786 shall be corrected for partial pressure of water and exempt compounds.
- (d) Measurement of solvent losses from alternative application cleaning equipment subject to (C)(54)(b)(iii) shall be conducted in accordance with the South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" (11/1/9410/03/1989).
- (e) Measurement of acid content of a substance shall be determined by ASTM D1613-85.
- (f) Measurement of metal content of coatings shall be determined in accordance with South Coast Air Quality Management District's "Laboratory Methods of Analysis for Enforcement Samples" manual, Method 311-91 "Determination Analysis of Percent Metal in Metallic Coatings by Spectrographic Method", (06/01/1991)Method 311".
- (g) Capture Efficiency shall be determined according to USEPA's technical document, ""Revised Capture Efficiency Guidance for Control of Volatile Organic Compound Emissions" (February 7, 1995). Guidelines for Determining Capture Efficiency" (1/9/95).

- (h) The control efficiency of the Control Device Equipment shall be determined according to USEPA Test Methods 25 - Determination of Total Gaseous Nonmethane Organic Emissions as Carbon, 25A -Determination of Total Gaseous Organic Concentration Using a Flame *Ionization Analyzer* or 25B - Determination of Total Gaseous Organic Concentration Using a Nondispersive Infrared Analyzer for measuring the total gaseous organic concentrations at the inlet and outlet of the emissions Control DeviceEquipment, as contained in 40 CFR Part 60, Appendix A. USEPA Test Method 18 or CARB Method 422 - Determination of Volatile Organic Compounds in Emissions from Stationary Sources (Exempt VOCs) shall be used to determine emissions of exempt compounds.
- (i) Measurement of solids content by weight of a substance shall be conducted in accordance with ASTM D1475-6090 - Test Method for Density of Paint, Varnish Lacquer, and Related Products.
- Measurement of viscosity shall be conducted in accordance with ASTM D1200-14 – Standard Test Method for Viscosity by Ford Viscosity Cup. [Method proposed in the SCAQMD amendment for Rule 1107, July 2012, as the appropriate methods for determining viscosity.]
- (k_i) Alternative test methods may be used upon obtaining the approval of the APCO, CARB and USEPA.
- <u>(3)</u> The following calculations shall be used to determine compliance with the provisions of this Rule::
 - Grams of VOC Per Liter of Coating Less Water and Less Exempt (a) Compounds" (VOC Content):

$$G_{v} = \frac{W_{s} - W_{w} - W_{es}}{V_{m} - V_{w} - V_{es}}$$

Where:

Grams of VOC per Liter of Coating Less Water and Less $\underline{G}_{\underline{v}}$

Exempt Compounds

 W_{s} Weight of volatile compounds in grams

 $W_{\rm w}$ Weight of water in grams

 $\underline{\mathbf{W}}_{\mathrm{es}}$ Weight of exempt compounds in grams

 $\underline{\mathbf{V}}_{\mathbf{m}}$ Volume of material in liters $\underline{V}_{\underline{w}} = \underline{Volume of water in liters}$

 \underline{V}_{es} \equiv Volume of exempt compounds in liters

(b) Grams of VOC Per Liter of Material:

Where:

$$G_{v} = \frac{W_{s} - W_{w} - W_{es}}{V_{m}}$$

Where:

 $\underline{G_{v}} = \underline{Grams of VOC Per Liter of Coating Less Water and Less}$

Exempt Compounds

 $\underline{W}_s \equiv \underline{\text{Weight of volatile compounds in grams}}$

 $\underline{W}_{w} = \underline{Weight of water in grams}$

 $\underline{W}_{es} \equiv \underline{Weight of exempt compounds in grams}$

 $\underline{V}_{m} = \underline{Volume of material in liters}$

- (34) The following test method is recommended required for use in determining Transfer Efficiency of alternative application methods: [Renumbered and updated to pursuant USEPA verbal comment, 12/18/17.]
 - (a) Demonstration of Transfer Efficiency of alternative application methods subject to subsection (C)(1)(a)(vix) shall be conducted in accordance with South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User": (5/24/89).

See SIP Table at http://www.mdaqmd.ca.gov

[SIP: Approved 12/23/97, 62 FR 67002, effective 2/26/98, 40 CFR 52.220(c)(239)(i)(A)(2); Submitted as adopted 03/02/92 on 6/19/92.]

MDAQMD Rule 1115 1115-21

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Appendix "B"Public Notice Documents

- Proof of Publication Riverside Press Enterprise, September 22, 2017 Proof of Publication Daily Press, September 22, 2017 1.
- 2.

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THE PRESS-ENTERPRISE

1825 Chicago Ave, Suite 100 Riverside, CA 92507 951-684-1200 951-368-9018 FAX

PROOF OF PUBLICATION (2010, 2015.5 C.C.P)

Publication(s): The Press-Enterprise

PROOF OF PUBLICATION OF

I am a citizen of the United States. I am over the age of eighteen years and not a party to or interested in the above entitled matter. I am an authorized representative of THE PRESS-ENTERPRISE, a newspaper in general circulation, printed and published daily in the County of Riverside, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under date of April 25, 1952, Case Number 54446, under date of March 29, 1957, Case Number 65673, under date of August 25, 1995, Case Number 267864, and under date of September 16, 2013. Case Number RIC 1309013; that the notice, of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

09/22/2017

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Date: September 22. 2017 At: Riverside, California

Legal Advertising Representative, The Press-Enterprise

MOJAVE DESERT AQMD 14306 PARK AVE ATTN: D. HERNANDEZ VICTORVILLE, CA 92392

Ad Number: 0011012355-01

P.O. Number:

Ad Copy:

NOTICE OF HEARING

NOTICE IS HERBEY GIVEN that the Governing Board of the Mojave Desert Air Quality Monagement District (MDAGMD) will conduct a public hearing on October 23, 2017 at 10:00 A.M. to consider the proposed amendment of Rule 102 – Definition of Term State of the Consider That Dispensing, Rule 461 – Gosoline Transfer and Dispensing, Rule 461 – Gosoline Transfer and Dispensing, Parts & Products Coding Operations, and Rule 1160 – Internal Combustion Engines.

Rule 1160 - Internal Combustion Engines.

SAID HEARING will be conducted in the Governing Board Chambers located at the MDAGMD offices 14305 Park Avenue, Victorville, CA 92392-2310 where all Interested persons may be present and be heard. Copies of the proposed rules and the associated Staff the Executive Office. Manager at the Executive Office Manager at the Executive Office Manager at the MDAGMD Offices. Written comments may be submitted to Brad Poliriez, APCO at the above office address. Written comments should be received no later than October 20, 2017 to be considered. If you have any questions regarding Rule 182 or Rule 115 you may solon 6122 for further Information. If you have any questions regarding Rules 461, 462, or 463 you may contact Michelle Zumwalt at extension 5756 for further information. If you have any questions regarding Rule 180 you may contact Michelle Zumwalt at extension 5756 for further information. If you have any questions regarding Rule 180 you may contact Michelle Zumwalt at extension 5756 for further information. If you have now questions regarding Rule 180 you may contact Shert Haggard at extension 186 driven and the proposed mendment of Rule 102 – Defi-

The proposed amendment of Rule 102 — Definition of Terms is necessary to shift common definitions used in the MDAQMD rulebook to Rule 102, and to update them for consistency and clarity.

Rules 461, 462, 463, 1115 and 1160 are proposed for amendment to satisfy 42 U.S.C. \$\$75116 (Federal Clean Air Act (FCAA) \$182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) and for maior sources of ozone precursors.

Pursuant to the California Environmental Quality Act (CEQA) the MDAQMD has determined that a Categorical Exemption (Class 8 – 14 Cal. Code Reg §15308) applies and has prepared a Notice of Exemption for this action.

FILED MOJAVE DESERT AQMD CLERK OF THE BOARD

SEP 2 7 2017

PROOF OF PUBLICATION

(2015.5 C.C.P.)

STATE OF CALIFORNIA, **County of San Bernardino**

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the of the DAILY PRESS, publisher general circulation, newspaper of published in the City of Victorville, County of San Bernardino, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of San Bernardino, State of California, under the date of November 21, 1938, Case number 43096, that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

September 22

All in the year 2017.

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated this: 22nd day of September,

Signature

Leslie Jacobs

This space is the County Clerk's Filing Stamp

FILED MOJAVE DESERT AQMD CLERK OF THE BOARD

SEP 2 7 2017

Proof of Publication of NOTICE OF HEARING

NOTICE OF HEARING

NOTICE OF HEARING

NOTICE IS HEREBY
GIVEN that the Governing Board of the Mojave
Desert Air Quality Management District
(MDAQMD) will conduct
a public hearing on October 23, 2017 at 10:00
A.M. to consider the proposed amendment of
Rule 102 – Definition of
Terms, Rule 461 – Gaodine Transfer and Dispensing Rule 462 – Organic Liquids
Rule 1115 – Metal Parts &
Fronce of Companic Liquids,
Rule 1115 – Metal Parts &
Fronce of Companic Liquids
Conding Opera

Internal Combustion

SAID HEARING will be conducted in the Govern-ing Board Chambers loc-ated at the MDAQMD of-fices 14306 Park Avenue, Victorville, CA 92392-2310 where all interested Victorville, CA 92392-2310 where all interested persons may be present and be heard. Copies of the proposed rules and the associated Staff Re-ports are on file and may-ecutive Office in the proposed with the comments may written comments may be submitted to Brad Poirlez, APCO at the above office address. Written comments should be received no later than October 20, 2017 to be considered. If you have any questions regarding, rule 102 or Rule 1115-you may contact Tracy Walters at (760) 245-1661 extension 6122 for further information. If you have any guestions regarding Rules 461, 462,

are Aprils of introduction in formation. If you have any questions regarding Rule 1160 you may contact Sheri Haggard at extension 1864 for further information. Traducción esta disponible por solicitud.

The proposed amendment of Rule 102 – Definition of Terms is necessary to shift common definitions used in the MDAQMD rulebook to Rule 102, and to update them for consistency and clarity.

clanty.

Rules 461, 462, 463, 1115 and 1160 are proposed for amendment to satisfy 42 U.S.C. \$87511a (Federal Clean Air Act. (FCAA) \$1820 which requires that ozone non-at-ainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) and for major sources of ozone precursors.

Pursuant to the Califor-Exemption (Class 8 – 14 Cal. Code Reg §15308) applies and has prepared a Notice of Exemption for this action.

> Published in the Daily Press September 22, 2017 (F-95)

Appendix "C"

Public Comments and Responses

- 1. Metropolitan Water District of Southern California, July 29, 2015. (Supporting documents provided by MWD are included in the Rule archive.)
- 2. EPA Comments on Mojave Desert Rule 1115 Metal Parts& Products Coating Operations, 08/25/2017
- 3. Metropolitan Water District of Southern California email, 8/25/2017 Supporting documents provided by MWD are included in the Rule archive.)
- 4. Metropolitan Water District of Southern California email, October 11, 2017
- 5. Metropolitan Water District of Southern California email, October 30, 2017
- 6. EPA comments on MDAQMD Rule 1115, draft dated 11/7/2017, December 19, 2017.

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July 29, 2015

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Bret Banks Deputy Director Antelope Valley Operations Mojave Desert Air Quality Management District 14306 Park Avenue Victorville, California 92392-2310

Dear Mr. Banks:

MDAQMD Notice to Comply 4421, 3M Scotchkote Spray System HSS-450

This correspondence is a follow-up to the July 27, 2015 conversation last week between you and Ms. Carol Kaufman of my staff, regarding Notice to Comply (NTC) 4421, which was issued subsequent to the June 10, 2015 inspection of the Metropolitan Water District of Southern California (Metropolitan), Gene Pumping Plant. The NTC requests compliance verification of the transfer efficiency for the 3M Scotchkote Spray System HSS-450 (Spray System) with MDAQMD Rule 1115, to be followed by applicable permitting.

To address the NTC, in the July 27th discussion you were receptive to reviewing the applicability of the latest South Coast Air Quality Management District (SCAQMD) rulemaking activities for Rule 1107, Coating of Metal Parts and Products. In their 2012 rulemaking, SCAQMD proposed added flexibility to allow other spray equipment options for high viscosity coatings, and recommended that high viscosity coatings be exempt from the transfer efficiency requirements. The 3M Spray System falls under these criteria, as it is dedicated to the application of 3M Liquid Epoxy Coating 323, which is a 100% solids epoxy coating with a VOC content as mixed of 12 g/L. Additionally, in permitting the high viscosity, high solids coating application equipment, SCAQMD has taken the approach of not requiring permits for coating equipment that has VOC emissions of three pounds per day or less or 66 pounds per calendar month or less. Therefore, in alignment with the SCAQMD's approach, we are asking that the 3M Scotchkote 323 Spray System similarly not be subject to the MDAQMD metal parts coating transfer efficiency and permitting requirements.



Background

The Spray System utilizes a dual-cartridge setup along with unique application equipment designed specifically to spray apply the 100 % solids epoxy coating, Scotchkote 323. The novel system is designed to improve application efficiency, and can provide high build in one pass up to 45 mils (1150 microns). As compared to standard application methods, this can effectively reduce the need for additional coats up to four times. Attachment 1 is the brochure describing the 3M Scotchkote Spray System HSS-450 Spray System.

Mr. Bret Banks Page 2 July 29, 2015

In recognition of the Spray System's improved application efficiency combined with the high viscosity and low VOC content of the Scotchkote 323, SCAQMD's proposed and existing rule requirements are as follows below.

Transfer Efficiency:

To date no formal transfer efficiency information has been available from either 3M or the Spray System manufacturer, Plas-Pak Industries. However, the properties of the high viscosity coatings and their application equipment were recognized during the SCAQMD 2012 rulemaking activities to amend Rule 1107. In their July 2012 Proposed Amended Rule (PAR) 1107 (Attachment 2), the following was proposed:

- (f) Exemptions (8) The provisions of paragraph (c)(1)* shall not apply to metal coatings with a viscosity of 650 centipoise or greater, as applied.
 - *(c)(1) refers to approved operating equipment, including HVLP guns, and guns with specific transfer efficiencies.

In further reference to transfer efficiency, the SCAQMD July 2012 PAR 1107 Preliminary Draft Staff Report (page 9) (Attachment 3) states that, "The options available for coating application equipment will be expanded for high viscosity coatings. Flexibility will be provided for shops that are able to document that alternative application equipment would reduce emissions beyond HVLP spray technology. Some coating properties such as high solids content may make HVLP spray application impractical without additional thinning. Facilities may submit a plan providing for the District to review and allow other spray techniques where the use of HVLP equipment would result in greater emissions. Additionally, an exemption will be included for high viscosity coatings."

Permitting:

In recognition of the properties of high viscosity coatings, SCAQMD Rule 219, Equipment Not Requiring a Written Permit Pursuant to Regulation II, (l)(6) (Attachment 4), exempts the following:

"Coating or adhesive application or laminating equipment such as air, airless, air-assisted airless, high volume low pressure (HVLP), air brushes, electrostatic spray equipment, roller coaters, dip coaters, vacuum coaters, flow coaters and spray machines provided that:

(A) the VOC emissions from such equipment (including clean-up) are three (3) pounds per day or less or 66 pounds per calendar month or less".

Attachments

In support of our request, the following documents are attached:

- 1. MDAQMD Notice to Comply No. 4421, Dated 7/15/15
- 2. 3M Scotchkote Spray System HSS-450 Manufacturer Information (14 pages)
- 3. SCAQMD Preliminary Draft Staff Report for Proposed Amended Rule 1107 Coating of Metal Parts and Products, Highlighted Text on Pages 2, 9, 14, 37, 56-58 (23 pages)
- 4. SCAQMD Proposed Amended Rule 1107 Coating of Metal Parts and Products (21 pages)
- SCAQMD Rule 219 Equipment Not Requiring a Written Permit Pursuant to Regulation II (6 pages)

Mr. Bret Banks Page 3 July 29, 2015

We appreciate your review of our request to resolve the NTC. The Spray System's efficient design, in conjunction with the high viscosity and low VOC content of the Scotchkote 323 coating, merit alignment of the transfer efficiency and permitting requirements with SCAQMD's approach.

If you have any questions or require additional information, please contact Ms. Carol Kaufman at (213) 217-6207.

Very Truly Yours,

Daniel J. Guillory

Manager, Environmental Program Support Team

S:SES corres/Kaufman, Carol/ R-15-64 MDAQMD NTC 4421 MWD Reply7-29-15.doc

Attachments

cc: Mr. Alan De Salvio, Deputy Director Mojave Desert Operations, MDAQMD

Mr. Daniel Concho, Air Quality Specialist, MDAQMD

Ms. Roseana Navarro-Brasington, Air Quality Engineer, MDAQMD

1. Subsections (C)(1)((a)(x)) and (D)(7) were added to address transfer efficiency for high viscosity coatings, utilizing proposed SCAQMD Rule 1107 language .

2. EPA Comments on Mojave Desert Rule 1115 Metal Parts & Products Coating Operations, August 25, 2016

Hi Tracy,

We took a look at the preliminary draft of Rule 1115 and have the following comments.

This is in reference to the first draft (D1) of the MDAQMD Rule 1115, Miscellaneous Metal Parts and Products Operations dated 08/04/2017.

- 1. (C)(2)(a)(i) Coating Limits, Military Specifications: Please fix the typographical error from 340 g/l to 340 g/l.
- 2. (C)(2)(a)(i) Coating Limits: Please change the Coating Category from "One-Component" to "Prefabricated Architectural One-Component" as is in the corresponding CTG for Miscellaneous Metal Plastic and Parts (EPA 453-R-08-003) Table 2 on page 33.
- 3. (C)(2)(a)(i) Coating Limits: Please change the Coating Category from "Multi-Component" to "Prefabricated Architectural Multi-Component" as is in the corresponding CTG for Miscellaneous Metal Plastic and Parts (EPA 453-R-08-003) Table 2 on Page 33.

Feel free to give me or Arnie Lazarus (415-072-3024) a call if you want to discuss further. Thanks.

Nicole

Nicole Law Rules Office, Air Division U.S. EPA Region 9 75 Hawthorne Street San Francisco, 94105 Office: (415) 947-4126

- 1.
- Typographical error corrected.
 Coating category title changed as requested.
 Coating category title changed as requested. 2.
- 3.

3. Metropolitan Water District of Southern California, August 25, 2017

Hi Tracy,

Thank you for this quick follow-up to our discussion from a couple of weeks ago. You are correct in that SCAQMD did not complete the rulemaking activities back in the 2012 to amend Rule 1107, Metal Parts Coating, due to unresolved issues. However, SCAQMD is currently pursuing rulemaking activities to amend Rule 1168, Adhesives and Sealants, in which they are dealing with the similar issue of transfer efficiencies of application equipment based on the product viscosities. A copy of the most recent SCAQMD Proposed Amended Rule (PAR) 1168 is attached, adoption of which is scheduled in October 2016. In the SCAQMD PAR(i)(14), the amendments are proposing to change the existing allowance "For adhesives and sealants with a viscosity of 200 centipoise or greater to use HVLP, airless spray, air-assisted airless, and airatomized spray..." equipment, to an exemption from transfer efficiency requirements altogether. In alignment with this established concept, we ask that MDAQMD also consider providing in Rule 1115 a similar exemption from transfer efficiency requirements for metal coatings with a viscosity of 200 centipoise or greater. With regards to the 200 centipoise viscosity threshold, in the PAR 1107 and 1168 rulemaking activities, Metropolitan and SCAQMD have had multiple discussions about the viscosities of high solids products relative to transfer efficiency and application methods. For your reference, attached is a table that was originally assembled during the SCAQMD PAR 1107 rulemaking which lists the viscosities of various products and the manufacturer recommended application methods.

We appreciate the opportunity to participate in this rulemaking. Please let me know if you have any questions or require additional information.

Sincerely,

Carol Kaufman
Air Quality Program Manager
Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012
213-217-6207
FAX 213-217-6700
Cell 310-850-6105





Table 1, High Solids Product Information

Table 1, High Solids Product Information									
Product Name	Manufacturer	Product Type	Viscosity at Room Temperature (21 ° C) (cps)	VOC (g/L)	Manufacturer Recommended Application Method				
1. Raven AquataPoxy A-6, Part A	Raven Linings	100% Solid Epoxy Resin	10,000 - 18,000	0	Heated plural component airless or air-assisted spray				
2. Raven AquataPoxy A-6, Part B	Raven Linings	100% Solid Epoxy Resin	80,000 - 140,000	0	Heated plural component airless or air-assisted spray				
3. Scotchkote 323, Part A	3M	100% Solid Epoxy Resin	120,000 - 280,000	12	Gun Cartridge or heated plural component pump				
4. Scotchkote 323, Part B	3M	100% Solid Epoxy Resin	13,000 – 20,000	12	Gun Cartridge				
5. Powercrete J, Part A and B	Berry Plastics Corp	100% Solid Epoxy Resin	65,000	0	Gun Cartridge or heated plural component airless pump				
6. Amercoat 133	PPG Ameron	Ultra High Solids Epoxy	1,600 to 4,500	38	Airless				
7. Arc S2, Part A	Chesterton	Epoxy Resin	50,000	0	Heated plural component airless				
8. Arc S2, Part B	Chesterton	Epoxy Resin	6,000 – 19,000	0	Heated plural component airless				
9. Amerlock 2 VOC, Part A	PPG Industries, Inc.	Epoxy Resin	8,000-16,000	84	Airless spray, Conventional spray				
10. Amerlock 2 VOC , Part B	PPG Industries, Inc.	Epoxy Resin	4,000-8,000	84	Airless spray, Conventional spray				

11. Amershield VOC, Part B	PPG Industries, Inc.	Polyurethane Topcoat	8,000	84	Airless spray, Electrostatic spray, Conventional spray, Air-assisted airless spray
12. Amershield VOC, Part B	PPG Industries, Inc.	Polyurethane Topcoat	No Data (most likely < 10,000)	84	Airless spray, Electrostatic spray, Conventional spray, Air-assisted airless spray
13. Amercoat 68HS VOC, Part A	PPG Industries, Inc.	Epoxy Zinc Primer	1,000-3,000	84	Conventional spray, Airless spray
14. Amercoat 68HS VOC, Part B	PPG Industries, Inc.	Epoxy Zinc Primer	54-70	84	Conventional spray, Airless spray

1. The District appreciates the input on high viscosity substances currently available to industry and notes that all but one of the listed substances qualifies for the transfer efficiency exemption in the proposed rule. The District will update this rule and others as needed to remain consistent with similar coating rules adopted elsewhere in the state, after those similar rules are found to meet Reasonably Available Control Technology.

4. Metropolitan Water District of Southern California, October 11, 2017

Tracy Walters

From: Kaufman,Carol Y <cykaufman@mwdh2o.com>
Sent: Wednesday, October 11, 2017 5:49 PM

To: Tracy Walters

Cc: Alan De Salvio; Wallace, Johnny; Cotter, Sean T; Fang, Anthony C; Bell, Janet J

Subject: MWD Comments -- MDAQMD Rule 1115 - Metal Parts & Products Coating Operations

Attachments: MD 1115 Staff Report D1.pdf

Importance: High

Hi Ms. Walters.

We appreciate the productive dialog that we have had with MDAQMD during the rulemaking activities to amend Rule 1115. The proposed revisions that recognize the viscosities of high solids coating products relative to transfer efficiency and application methods will be beneficial in allowing the proper manufacturer prescribed equipment to be used to apply high solids-low VOC products. As discussed on Tuesday, Metropolitan would like to provide additional comments to facilitate any needed transition to the lower VOC materials.

 $1 \rightarrow$

As currently proposed, the reduced Coating VOC limits listed in (C)(2) do not have a specified effective date. To formally provide users with reasonable time to switch to the newly reduced VOC products, we suggest that *effective dates be provided for the new VOC limits*. This approach is similar to that already provided in the MDAQMD existing Rule 1113, Architectural Coatings. Rule 1113 also contains a "Sell-Through of Coatings" provision, (C)(5); inclusion of a similar language in Rule 1115 would be beneficial.

- (5) Sell-Through of Coatings
 - (a) A Coating listed in Table 1 or Table 2 and manufactured prior to January 1, 2013 effective date may be sold, supplied, or offered for sale for up to three years after the January 1, 2013, so long as the Coating complied with the standards in effect at the time the Coating was manufactured. A Coating listed in Table 1 or Table 2 and manufactured before the January 1, 2013 effective date may be applied at any time, both before and after January 1, 2013, so long as the Coating complied with the standards in effect at the time the Coating was manufactured. This subsection does not apply to any Coating that does not display the date or date-code required by subsection (D)(1)(a).

Thank you for your consideration of these recommendations. Please let me know if you have any questions or would like to discuss further.

Best Regards,

Carol Kaufman Air Quality Program Manager Metropolitan Water District of Southern California 700 North Alameda Street Los Angeles, CA 90012

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213-217-6207 FAX 213-217-6700 Cell 310-850-6105





1. Former subsection (C)(2)(b) was modified to new subsection (C)(3) – Sell-Through and Use of Coatings. Since there are only two coatings proposed with lower limits, General and Military Specification, these were given a 1 year additional compliance date of approximately January 31, 2019 (about 1 year after the rule amendment).

5. Metropolitan Water District of Southern California, October 30, 2017

Tracy Walters

From: Kaufman,Carol Y < cykaufman@mwdh2o.com>
Sent: Thursday, November 30, 2017 3:55 PM

To: Tracy Walters

Cc: Cotter,Sean T; Fang,Anthony C; Bell,Janet J; Gabelich,Christopher J
Subject: MWD Comments -- MDAQMD Proposed Amendments to Rule 1115

Hi Tracy,

We appreciate the opportunity to continue working with MDAQMD staff on Rule 1115, Metal Parts Coating. As we have discussed, we are asking that MDAQMD consider the inclusion of a provision specifically for the use of highly specialized electric-insulating and thermally-conducting coatings. These types of coatings are used during maintenance and repair of the main armatures at Metropolitan's desert pump plants, and on electrical connections, rotor windings, oil reservoirs, rotors, and stators. Historically very low quantities of these types of coatings have been used – during the last two years, Metropolitan's use at each of our pump plants has been approximately two gallons or less per facility (Iron Mountain, Gene, and Intake Pump Plants within the MDAQMD jurisdiction).

As discussed, SCAQMD Rule 1107, Coating of Metal Parts and Products, currently has the following provisions related to this type of specialized performance coating:



(b) Definitions

(12) ELECTRIC-INSULATING AND THERMAL-CONDUCTING COATING is a coating that displays an electrical insulation of at least 1000 volts DC per mil on a flat test plate and an average thermal conductivity of at least 0.27 BTU per hour-foot-degree-Fahrenheit.

(f) Exemptions

- The provisions of paragraphs (c)(1) and (c)(2) of this rule shall not apply to:
 - (E) Electric-insulating and thermal-conducting coatings.

Thank you for your consideration of this request. Please contact me if you have any questions or require additional information.

Sincerely,

Carol Kaufman
Air Quality Program Manager
Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012
213-217-6207
FAX 213-217-6700
Cell 310-850-6105

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1. Definition and exemption have been added for consistency between district rules. This will reduce confusion for facilities using the same product in adjoining districts. This is an extremely low use coating.

6. EPA comments on MDAQMD Rule 1115, December 19, 2017

Tracy Walters

 From:
 Law, Nicole < Law.Nicole@epa.gov>

 Sent:
 Tuesday, December 19, 2017 11:55 AM

To: Tracy Walters; Alan De Salvio
Cc: Lo, Doris; Bushey, Douglas

Subject: EPA comments on MDAQMD Rule 1115, draft dated 11/7/2017

Hi Alan and Tracy,

Thanks for the phone call yesterday regarding our comments on MDAQMD Rule 1115, dated 11/7/2017. Here are our comments.

- Section (C)(1)(a) contains an "or" following section (viii). However, section (viii) is no longer the penultimate item on the list and we suggest moving or removing the "or."
- Section (C)(1)(a)(ix) provides an alternative to the required application methods, but does not require
 demonstration that the alternative's transfer efficiency is at least equal to or better than HVLP spraying. Make
 this alternative enforceable by replacing the word "recommended" in the final paragraph of the rule (section
 (G)(3) of this draft of the rule) with the word "required."
- Section (C)(1)(a)(x) does not specify how a demonstration is made and contains director's discretion. Please
 either bound this discretion, or add a requirement for CARB and EPA approval of the equipment.
- Section (C)(1)(a)(x) also contains a typographical error. The word "listen" should be "listed."
- Section (C)(5)(b) contains the word "or" between some but not all items. This section should be reorganized to clarify which items are options and which are requirements.
- Section (C)(5)(b)(vi) contains director's discretion. Please either bound this discretion, or add a requirement for CARB and EPA approval.
- Section (F)(1)(a) should include a references to Section (D)(5) in addition to (D)(2), (D)(3)(a), and (D)(3)(b).
- The last paragraph is currently numbered (G)(3) but should be renumbered to (G)(4). Also, the reference to section (C)(1)(a)(v) should be replaced with (C)(1)(a)(ix).

If you have any further comments, please feel free to give me a call. Happy Holidays!

Nicole

Nicole Law Rules Office, Air Division U.S. EPA Region 9 75 Hawthorne Street San Francisco, 94105 Office: (415) 947-4126

Nicole Law Rules Office, Air Division U.S. EPA Region 9 75 Hawthorne Street San Francisco, 94105 Office: (415) 947-4126

1

- 1. Moved "or" to subsequent section as requested.
- 2. Replaced "recommended" with "required" as requested.
- 3. CARB and EPA added as requested.
- 4. Typographical error corrected as noted.
- 5. This section has been reorganized for clarity as requested.
- 6. CARB and EPA added as requested.
- 7. Reference to subsection (D)(5) added as requested.
- 8. Paragraph has been renumbered and cross reference updated as requested.

Appendix "D"

California Environmental Quality Act Documentation

- 1. Notice of Exemption San Bernardino County
- 2. Notice of Exemption Riverside County

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Mojave Desert Air Quality Management District

14306 Park Avenue, Victorville, CA 92392-2310 760.245.1661 • fax 760.245.2699

DATE FILED & POSTED
Posted On: 11 29 18
Removed On: 13 13 18

Visit our web site: http://www.mdaqmd.ca.gov Brad Poiriez, Executive Director

Receipt No: 310-01392018-050

NOTICE OF EXEMPTION

TO: County Clerk

San Bernardino County 385 N. Arrowhead, 2nd Floor San Bernardino, CA 92415 FROM: Mojave Desert

Air Quality Management District

14306 Park Ave

Victorville, CA 92392-2310

X MDAQMD Clerk of the Governing Board

PROJECT TITLE: Amendment of Rule 1115 - Metal Parts & Products Coating Operations.

PROJECT LOCATION – SPECIFIC: San Bernardino County portion of the Mojave Desert Air Basin and Palo Verde Valley portion of Riverside County.

PROJECT LOCATION - COUNTY: San Bernardino and Riverside Counties

DESCRIPTION OF PROJECT: The proposed amendment of Rule 1115 – Metal Parts & Products Coating Operations will satisfy 42 U.S.C. §§7511a (Federal Clean Air Act (FCAA) §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) documents issued by United States Environmental Protection Agency (USEPA) for "major sources" of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors. The proposed amendment of Rule 1115 also satisfies the provisions of former Health & Safety Code (H&S Code) §39614(d) (expired by its own terms on January 1, 2011) which requires the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by the California Air Resources Board (CARB).

NAME OF PUBLIC AGENCY APPROVING PROJECT: Mojave Desert AQMD

NAME OF PERSON OR AGENCY CARRYING OUT PROJECT: Mojave Desert AQMID

EXEMPT STATUS (CHECK ONE)

Ministerial (Pub. Res. Code §21080(b)(1); 14 Cal Code Reg. §15268)

Emergency Project (Pub. Res. Code §21080(b)(4); 14 Cal Code Reg. §15269(b))

X Categorical Exemption – Class 8 (14 Cal Code Reg. §15308)

REASONS WHY PROJECT IS EXEMPT: The proposed amendments to Rule 1115 are exempt from CEQA review because the amendments will not create any adverse impacts on the environment. The proposed rule amendments are more stringent than the previous rule version. Because there is no potential that the amendments might cause the release of additional air contaminants or create any adverse environmental impacts, a Class 8 categorical exemption (14 Cal. Code Reg. §15308) applies.

LE	AD AGEN	CY CONTA	ØT PERSO	ON: Brad P	oiriez	PH0	ONE: <u>(76</u>	0) 245-160	51
SI	GNATURE	:Bru I	£	TITLE:	Executive	e Directo	DATE:	January 2	2, 2018
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MojaverDesert Air (MOJAVE DESERT AQME 306 Par CLERK OF THE BOARD

FEB 0 5 2018

FILED/POSTED

County of Riverside Peter Aldana



Brad Poiriez, Executive Director

NOTICE OF EXEMPTION

Clerk/Recorder TO:

Riverside County 3470 12th St. Riverside, CA 92501 FROM: Mojave Desert

Air Quality Management District

14306 Park Ave

Victorville, CA 92392-2310

X MDAQMD Clerk of the Governing Board

PROJECT TITLE: Amendment of Rule 1115 – Metal Parts & Products Coating Operations.

PROJECT LOCATION - SPECIFIC: San Bernardino County portion of the Mojave Desert Air Basin and Palo Verde Valley portion of Riverside County.

PROJECT LOCATION - COUNTY: San Bernardino and Riverside Counties

DESCRIPTION OF PROJECT: The proposed amendment of Rule 1115 – Metal Parts & Products Coating Operations will satisfy 42 U.S.C. §§7511a (Federal Clean Air Act (FCAA) §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) documents issued by United States Environmental Protection Agency (USEPA) for "major sources" of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NOx) which are ozone precursors. The proposed amendment of Rule 1115 also satisfies the provisions of former Health & Safety Code (H&S Code) §39614(d) (expired by its own terms on January 1, 2011) which requires the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by the California Air Resources Board (CARB).

NAME OF PUBLIC AGENCY APPROVING PROJECT: Mojave Desert AQMD

NAME OF PERSON OR AGENCY CARRYING OUT PROJECT: Mojave Desert AQMD

EXEMPT STATUS (CHECK ONE)

Ministerial (Pub. Res. Code §21080(b)(1); 14 Cal Code Reg. §15268) Emergency Project (Pub. Res. Code §21080(b)(4); 14 Cal Code Reg. §15269(b))

X Categorical Exemption - Class 8 (14 Cal Code Reg. §15308)

REASONS WHY PROJECT IS EXEMPT: The proposed amendments to Rule 1115 are exempt from CEQA review because the amendments will not create any adverse impacts on the environment. The proposed rule amendments are more stringent than the previous rule version. Because there is no potential that the amendments might cause the release of additional air contaminants or create any adverse environmental impacts, a Class 8 categorical exemption (14 Cal. Code Reg. §15308) applies.

LEAD AGENCY CONTACT PERSON: Brad Poiriez PHONE: (760) 245-1661

TITLE: Executive Director DATE: January 22, 2018 SIGNATURE:

DATE RECEIVED FOR FILING

Apple Valley

City of Needles County of

County of San

City of

City of

City of

Appendix "E"Bibliography

The following documents were consulted in the preparation of this staff report.

- 1. Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings (EPA-453/R-08-003, September 2008)
- 2. Control of Volatile Organic Emissions From Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products (EPA-450/2-78-015, June 1978)
- 3. Control Techniques Guidelines: Industrial Cleaning Solvents (EPA 453/R-06-001, September 2006)
- 4. *Control Techniques Guidelines for Large Appliance Coatings (EPA 453/R-07-004, September 2007)*
- 5. Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, September 2007)
- 6. Monterey Bay Unified Air Pollution Control District Rule 434 *Coating of Metal Parts and Products*, amended 01/17/2001 (66 FR 50319, 10/31/2001)
- 7. Bay Area Air Quality Management District Rule 8-19 *Surface Preparation and Coating of Miscellaneous Metal Parts and Products*, amended 10/16/2002 (69 FR 62588, 10/27/2004)
- 8. San Diego Air Pollution Control District Rule 67.3 *Metal Parts and Products Coating Operations*, amended 04/09/2003 (68 FR 64538. 11/14/03)
- 9. South Coast Air Quality Management District Rule 1107 *Coating of Metal Parts and Products*, amended 01/06/2006 (73 FR 70883, 11/24/2008)
- 10. Ventura County Air Pollution Control District Rule 74.12 *Surface Coating of Metal Parts and Products*, amended 04/08/2008 (76 FR 30025, 5/24/2011)
- 11. Placer County Air Pollution Control District Rule 245 *Surface Coating of Metal Parts and Products*, amended 08/20/2009 (76 FR 30025, 5/24/2011)
- 12. San Joaquin Valley Unified Air Pollution Control District Rule 4603 Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts, amended 09/17/2009 (76 FR 67369, 11/01/2011)
- 13. Sacramento Metropolitan Air Quality Management District Rule 451 *Surface Coating of Miscellaneous Metal Parts and Products*, amended 09/25/2008 (76 FR 71886, 11/21/2011)
- 14. MDAQMD List and Implementation Schedule for District Measures to Reduce PM Pursuant to Health and Safety Code §39614(d), adopted June 27, 2005.

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